



Tennessee Department of Labor and Workforce Development

Workforce Investment Act of 1998

**Monitor Review & Grantor Program Information
Template
2006-2007**

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Employment Workforce Development
Tennessee Department of Labor and Workforce Development

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Tennessee Department of Labor and Workforce Development
Workforce Investment Act of 1998: Monitoring Review Guide and
Grantor Program Information Template

I. INTRODUCTION AND OVERVIEW

The eighth year of Tennessee's implementation of the Workforce Investment Act of 1998 (WIA) is underway as this monitoring guidebook is presented for state fiscal year 2006 - 2007. Federal support for WIA stems from the United States Department of Labor, Employment and Training Administration (ETA) which delivers two basic funding streams: Title I (WIA) and Wagner-Peyser. The funds are distributed to sub-recipients in Tennessee by the Department of Labor and Workforce Development. This means that for the seventh consecutive year the Division of Employment & Training, Department of Labor and Workforce Development, is relying upon Program Accountability and Review (PAR) to conduct sub-recipient monitoring reviews of our contractors. OMB Circular A-133 and F&A's Policy 22 (Revised 7/1/04) have defined our contractors as sub-recipients, and WIA 1998 requires that all WIA contractors should be reviewed at least once each year. **20 CFR §667.400 (c)(2)**

A. Overview of Tennessee's Plan

The plan put into place for WIA in Tennessee refocused the state's employment and training system upon seamless, One-Stop Career Centers and their affiliates, designed to deliver streamlined services, universal participant access, local and private sector oversight, flexibility, accountability, and strong youth programs. In addition, WIA in Tennessee is the product of many plans, not just one; and the result of six years of local and state planning, and hard work, is a comprehensive approach to the workforce development system in Tennessee.

On the local level, the parties to the workforce development system are LWIBs (Local Workforce Investment Board), LWIAs (Local Workforce Investment Area), One-Stop Career Centers (see *20 CFR §662.200 Subpart B* for the list of allowable One-Stop partners), Youth Councils, and a wide variety of employers, community based providers, and private sector providers; on the State level, the parties to technical and administrative support stem from the State Workforce Development Board, the Youth Board, Labor and Workforce Development, Education, Human Services, Tennessee Board of Regents, Tennessee Higher Education Commission, AFL-CIO, and the University of Memphis. The emphasis of all parties to workforce development is on a unified and diverse partnership helping clients to good jobs and self-sufficiency, as well as assisting employers toward an educated and skilled workforce. Another major emphasis of WIA 1998 is to improve coordination between the various workforce development system partners: adult education, literacy, and vocational rehabilitation programs as well as the vocational education programs are addressed in separate legislation. WIA links programs and support in several ways, as follows:

- **State Board** - To guide development of the state's workforce development system and coordinate the plans of federally funded programs.
- **Local Board** - Established by local elected officials to set policy and oversee job-training programs.

- **One-Stop Systems/Career Centers and/or Affiliate Sites** - Delivery systems for citizens and industry to explore career development or business services and access programs electronically.
- **Unified State Plan** - States may integrate planning for the use of federal funds by submitting unified plans for two or more workforce development programs.
- **Shared Accountability** - Accountability is measured by performance standards and levels proposed by states and negotiated with the appropriate federal agencies.
- **Common Terms** - Definitions for performance measures will be developed by special groups of public and private interests from the federal, state and local levels.
- **Waivers** - States may obtain waivers of administration to process regulations in order to bridge the boundaries between separate programs.

Other major points emphasized in the legislation include a "work first" approach - using the labor market to evaluate the pool of workers seeking employment and training assistance. Only those who fail to find work after the initial core services are eligible for the "intensive services" stage. Then, only those who do not find work after the intensive services will be eligible to receive Individual Training Accounts (ITAs) to pay for their training.

Title I and Wagner-Peyser make the unified partnership possible, and funds then are distributed in Tennessee through incentive and competitive grants to LWIAs. The formal grant recipients are the chief elected officials, or county mayors. *WIA §117 (d)(3)(B)(i)(I)* Noncompetitive grant awards to LWIAs can be made under limited circumstances. *WIA §171 (b)(2)(A)*. Partnerships on the local level and for the One-Stop Career Centers and affiliated sites are delivered in Memoranda of Understanding (MOU), as well as competitive cost-reimbursement contracts with eligible employment and/or youth program service providers. The designated agency is the Department of Labor and Workforce Development.

The purpose of the state-initiated grant contracts is to establish and support public programs that deliver accurate information and performance-based employment and training activities for adults, youth, and dislocated workers. The expected results of these contracts are to increase employment and earnings as well as educational and occupational skills, decrease welfare dependency, improve the quality of the workforce, enhance worker productivity, the competitiveness of the nation, and continuous service improvement. This means that the opportunity to deliver employment and training services in the One-Stop partnership depends upon a proposed provider's designation or certification as an Eligible Service Provider. *WIA §121* Eligible providers are identified according to performance, and through the state working in collaboration with LWIBs. Specific performance indicators are discussed separately in this monitoring review guide.

The grants awarded by Employment and Workforce Development consisted of, as they presently do, cost-reimbursement contracts awarded in most cases to local government, county

administrative units. As provided in WIA 1998, LWIAs are permitted to submit optional modifications to their local plans during the period covered by their plan. **WIA §112 (d)**

Additional emphasis is placed on quality service and continuous improvement in performance outcomes. The aggregate effort of the providers in a Local Workforce Investment Area (LWIA) determines an area's annual performance, and the combined efforts of the areas will be reflected in statewide performance. All states were required to complete implementation of the federal workforce provisions by July 1, 2000.

B. WIA: First Years of Implementation

During the first six years of the WIA program, the Department of Labor & Workforce Development's Employment and Workforce Development Section continuously engaged in conversations with LWIAs experiencing the challenges of implementing a new program. As a result, technical assistance was delivered to several of the areas by Employment and Workforce Development Technical Assistance staff.

WIA 1998 specifies performance measures and outcomes for all of its providers. As a result, during the initial years of WIA 1998, the Employment and Training unit reviewed the implementation status of each LWIA. The unit is required to provide such assistance to any area that is failing at least one of the federal/state performance measures. When such specialized assistance is provided and reports are generated, the reports will be forwarded to PAR for informational purposes. PAR monitors should follow the recently updated Review Guide (**Exhibit 1**) provided by the department's Employment and Workforce Development staff and any other financial accounting guides approved by the state Department of Finance and Administration, as applicable to WIA Title IB Programs.

The state-level partners and other community-based agency personnel have co-located staff and/or are linked electronically to provide a single point of entry for employment and training services. The state's **15** Comprehensive Career Centers and the **58** affiliate sites serve as anchors for the Career Center System (**Exhibit 5**). Services for job seekers provided at the centers and affiliate sites include skill upgrading through training; job search and job placements; and assisting employers in staff recruitment for new and existing companies. Since the early Workforce Development planning meetings in July of 1999, partner agencies and local entities have continued to work together to implement one of the best workforce systems in the nation.

C. Scope of Monitoring

The definition of the scope of monitoring has been submitted by means of the Contracts Report, which is submitted by the department's Budget and Fiscal Services Office. (**Exhibit 8**)

This report is the total list of sub-recipients for the state's 100 percent federally funded Workforce Investment program. It is the department's position, and the position of the federal funding agency that distributes WIA funds to the states, that such contractors should be monitored annually. National Emergency Grant contracts are to be monitored twice each year.

WIA §184 (A) 4 of the Workforce Investment Act requires each Governor of a state receiving WIA Title funds “to conduct on an annual basis onsite monitoring of each local area within the state to ensure compliance with the uniform administrative requirement.” **(Exhibit 6) 20 CFR §667.400 (c)(2)**

Employment and Workforce Development staff discussed the risk factors with our Budget and Fiscal Services office and modified a risk-based analysis form from another state agency to assess the risk level and determine which of our contractors were at higher risks than others. The results of this quick analysis of various factors support the need for monitoring on an annual basis.
(Exhibit 6) WIA §184(a)(4) 20 CFR §667.400(c)(2)

In order to conduct a thorough review, the PAR monitors must examine both the fiscal and programmatic aspects at the Administrative Offices and/or Comprehensive Career Centers within the LWIAs **(Exhibit 5, Career Centers)**. The updated Program Accountability Review Guide **(Exhibit 1)** and the Uniform Administrative Review instruments should be used to review expenditures, invoices, and contracts to tie information back to the contracts.

Prior to the monitoring reviews, PAR should receive a copy of the contracts from the department’s Budget & Fiscal Office. As far as locations of the monitoring reviews, a fiscal review and a programmatic review can be conducted at the Administrative Offices. However, a programmatic review would be incomplete without the monitors observing "first-hand" the delivery of participant services that occur in this process at the Comprehensive Career Centers/One Stop shops and/or affiliate sites.

II. GRANTOR PROGRAM INFORMATION TEMPLATE

A. Purpose and Program Contact Information

This outline should be used to gather information concerning the programs PAR has been asked to monitor during fiscal year 2006-2007. By using the questions below as a guide, PAR should receive consistent information from all grantors about their programs. The grantor can answer these questions and submit the information to PAR, or PAR staff can use this document as a guide when conducting information gathering meetings with grantors. Much of this information will be useful during grantor training in the fall.

Program Contact Information:

Susie Bourque, Assistant Administrator, Employment and Workforce Development
Dan Holton, Grants Program Manager
Department of Labor and Workforce Development
Andrew Johnson Tower, 1st Floor
710 James Robertson Parkway
Nashville, Tennessee 37243
Phone: 615-741-4092 (Bourque)
615-741-5326 (Holton)
Fax: 615-741-3003

Fiscal Contact Information:

Cathy Rowe, Fiscal Director
Mahrou Fatheddin, Accountant 3
Department of Labor and Workforce Development
Andrew Johnson Tower, 8th Floor
710 James Robertson Parkway
Nashville, Tennessee 37219
Phone: 615-741-5284 (Rowe)
615-741-5288 (Fatheddin)

B. Template Overview

The Workforce Investment Act of 1998 (H.R. 1385) rewrote federal statutes governing the nation's programs of job training, adult education, literacy, and vocational rehabilitation. The new federal legislation demanded that states build a more streamlined and a more flexible workforce development system that meets the needs of its customers and avoids the duplication of services.

To this end, WIA 1998 requires that a physical location in each LWIA be established which provides universal access to a specific array of Core and Intensive services delivered by One-Stop Career Centers (CC). **WIA §121 (e)** Additional services, including Training Services, and access

to Supportive Services also will be available in accordance with WIA 1998, E&WD, and LWIB guidelines.

Alternate and/or affiliate offices also have been established in the LWIAs, linked electronically or physically (**20 CFR Subpart A 662.100 (d)(2)**) for ease of access to this single point-of-entry for employment services. Collaboration between state and local interests have created consortia in each LWIA which are operational with partners through MOUs, and together must make available and have the capacity to deliver the required menu of WIA methods of service delivery as follows:

1. Universal Labor Exchange Services:

This WIA menu of services applies to each category of participant described in the following text. Using State merit-staff employees, Core Services and applicable Intensive Services, must be made available to all eligible adults, youth, and dislocated workers; including all employers and job seekers, Unemployment Insurance (UI) claimants, veterans, migrant and seasonal farm workers, and individuals with disabilities.

(20 CFR Subpart C 652.207 et seq.) (42 U.S.C. 4701 et seq.)

Core Services, with no eligibility requirements, consist of:

- a. Eligibility determinations
 - b. Job Search and placement assistance, including career counseling
 - c. Labor market information which identifies job vacancies, skills needed for demand occupations, and local, regional, and national employment trends
 - d. Initial assessment of skills and needs
 - e. LWIA performance outcomes
 - f. Assistance in establishing eligibility for welfare-to-work activities
 - g. Information about and referral to available supportive services, and
 - h. Follow-up services to help individuals keep their jobs once they are placed
- WIA §134 (d)(B)(2)**

Intensive Services consist of:

- a. Comprehensive assessments
 - b. Development of Individual Employment Plans
 - c. Group and individual counseling
 - d. Case Management, and
 - e. Short-term, prevocational services
- WIA §134 (d)(B)(3)**

Training Services consist of:

- a. Development of Individual Training Accounts (ITA)
- b. Occupational skills training
- c. On-the-job training
- d. Entrepreneurial training

- e. Skill upgrading
- f. Job readiness training, and
- g. Adult education and literacy

WIA §134 (d)(B)(4)

Supportive Services, when not available from other sources, consist of:

- a. Transportation
- b. Childcare, and
- c. Needs related payments necessary for participation in WIA

WIA §101 (46)

Program Service Providers

For-profit and non-profit providers may be used to deliver services. However, the training providers that the local workforce areas (LWIA) use for their respective areas must be approved by the Tennessee Higher Education Commission (THEC), as specified in Tennessee's State Plan, which is accessible on the department's website at <http://www.state.tn.us/labor-wfd/et.html>. The list of eligible training providers is routinely updated and can be accessed through the same hyperlink.

Allowable Activities: Focus Areas

It is important that PAR should review the IEPs (Individual Employment Plans) designed for participants and determine whether the plans have been implemented. PAR should expect to see ECMATS documentation that can be used to examine and track the activities of participants. This system will allow the review of the individual plan designed for the participant of an assessment conducted and the activities the participant received to address his or her needs. In addition, assessment of the abilities of each participant is a vital part of the WIA program.

Policies

New policies have been issued and the changes made to previous policies may be found on the department's website or in an updated copy of the *Workforce Investment Programs Technical Assistance Manual*. In addition, you can see **(Exhibit 7, Quick Reference Guide to E&T Policies.)**

State policies are not specifically stated in the contracts. The policies issued for this program are routinely posted on the department's website at the Employment and Training web page <http://www.state.tn.us/labor-wfd/et.html> after they are distributed via email and US mail to the LWIAs, and other WIA partners and contractors. The LWIAs either use the website, their email copies, or hardcopies. In addition, the unit has developed a WIA/ECMATs policy program manual and the *Workforce Investment Programs Technical Assistance Manual* that is distributed to the LWIAs annually.

Sample Size Requirements

WIA federal regulations do not specify what percentage or how many of the participant files should be reviewed. If the standard review PAR conducts is 20%, it should be adequate.

Exception-Based Guides

The current monitoring guide references policies and the *Workforce Investment Programs Technical Assistance Manual*. However, there have been policy changes and updates, and additional information has been added. As a result, we will be submitting updates to the monitoring guides as well as copies of the updated *Workforce Investment Programs Technical Assistance Manual*. These materials will be emailed to the PAR office as well as provided to monitors during training if necessary.

Program Fiscal Guidelines

1. Matching
 - The grantor does not require a match
2. Davis-Bacon
 - There are no construction projects
For Exceptions to construction project guidelines, please see: 20 CFR 667.260
3. Allowable Costs
 - Budget revisions need to be requested whenever increases or decreases are approved.
 - Close-out reports are due forty-five (45) days after the end of the contract period.
 - Payment methods are based upon 'draw down requests' submitted to the Fiscal Office. Instructions from our Financial Management Handbook are "The draw down request is to be faxed to the Tennessee Department of Labor and Workforce Development no less than five (5) days prior to the anticipated date the funds will be required. All contractors must estimate needs based upon cash outlays. Funds may be drawn down no more frequently than weekly."

Program Fiscal Reporting

A monthly Expenditure Report is due on each contract by the 20th of the following month. A Quarterly Report reflecting accrued expenditures by cost category, when needed, on a cumulative basis must be submitted on each contract by the 20th of the following month, or a date determined by Fiscal Services if necessary. The Quarterly Report must reflect program income, if any, and rebates or refunds to any program. There is also a WIA Stand-In Costs Report that must be submitted if costs are to be considered as a substitute for disallowed costs as a result of an audit or other review. A Close Out package is to be completed on each contract due forty-five (45) days after the end of the contract period.

2. Non-Discrimination

The Department of Labor and Workforce Development, State and Local Workforce Investment Boards, One-Stop Career Centers, service providers, vendors, and sub-recipients are committed to full compliance with the following nondiscrimination and equal opportunity laws and implementing regulations:

- Civil Rights Act of 1964
- Rehabilitation Act of 1973, Section 504
- Americans with Disabilities Act of 1990
- Title IX of the Education Amendment of 1972
- Age Discrimination Act of 1965
- Department of Justice Final Rule 2002
- WIA §188, and
- The regulations implementing the statutory provisions

Additional nondiscrimination requirements and guidelines for sub-recipient reviews also apply to all WIA funded activities described in this monitoring review guide, and are attached herein as **Exhibit 4**. Thus, PAR reviewers need to ensure that sub-recipients are in compliance with the listed nondiscrimination provisions, in accordance with *TCA § 4-4-123* and *TCA §4-21-901 et seq.*, which is in place to ensure that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. (*United States Code, §2000d*)

and that:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance. (*United States Code, §1681*)

and,

No person in the United States shall, on the ground of blindness or severely impaired vision, be denied admission in any course of study by a recipient of Federal financial assistance for any education program or activity, but nothing herein shall be construed to require any such institution to provide any special services to such person because of his blindness or visual impairment. (*United States Code, §1684*)

C. One-Stop Career System and Partners

Purpose: The One-Stop Career System centers and consortia partners administer and deliver employment services to adults, youth, and dislocated workers in order to improve access to WIA Title I program components and increase long-term employment opportunities for individuals. The required federal partners among the consortia include,

among others, Veterans Workforce programs, Wagner-Peyser programs, Adult Education and Literacy, Rehabilitation Act of 1973 programs, Social Security Act, and Trade Act of 1974 programs. (An exhaustive list of required partners can be found at **WIA §121 (b)(1)(B)(i-xii)**) It is allowable for additional entities to be named in the MOU, or included in competitive grant announcements, in order to administer and deliver TANF programs, National and Community Service Act programs, and more. **WIA §121 (b)(2)(B)(i-v)**. The following service components are provided through the One-Stop Career Center System:

1. **Adult Program** – The purpose of the Adult Program is to provide core, intensive, and training services to adults who need employment, education, training or support services under WIA Title I programs.

Adult Program Eligibility

The following is a description of eligible adults under WIA. Individuals must meet the following criteria: ***E&T Policy Memo 00-10***

1. Ages 18+

Adult Eligibility Documentation

PAR should ensure that eligibility is verified. The WIA Title I program is delivered statewide through the Career Center system which provides universal access to participants who are adults, youth, and dislocated workers, and employers. The allowable use of funds is determined by the eligibility criteria for each specific program or funding stream, and the individuals needs. The following is a list of basic, adult program eligibility requirements:

1. Social Security Number.
2. Proof of Citizenship or Permanent Residency Card.
3. Work Permit Issued by Immigration and Naturalization Service.
4. Receipt of Nondiscrimination Documents, with Signature of Participant
5. When funds for adult programs are limited (75% expended by 3rd Quarter) proof of income or qualifying disability is an eligibility requirement. ***E&T Memo 03-25***

Please note that the records needed to comply with requirements 1 through 3 shown above may vary. However, documentation of 1 through 3 shown above, at a minimum, may consist of one item from List A, **or** one each of the items from List B and List C of **Exhibit 10**.

WIA/ECMATS Program Manual
20 CFR 663.640
Exhibit 10

Adult Program Outcomes and Reporting

The state plan, as well as each LWIA plan, includes information regarding goals for each performance measure and how services will be provided in order to achieve successful outcomes for each measure. Federal guidance describes the opportunity for additional program funds if performance goals are successfully achieved. There also are possible sanctions if performance goals are not met. Please see the attached *Table for State Performance Indicators and Goals*; and for reporting parameters, please see the associated *Table for Data Capture and Reporting*.

Four (4) required performance measures apply to adult programs for reporting outcomes, plus two (2) additional measures which apply to all youth, adult, and dislocated workers served by WIA 1998, as follows:

1. Entry into unsubsidized employment.
2. Retention in unsubsidized employment six months after entry into the employment.
3. Earnings received in unsubsidized employment six months after entry into the employment.
4. Attainment of a recognized credential by participants who enter unsubsidized employment.

20 CFR 666.100(a)(1)

E&T Memo 01-14

1. Participants are interviewed once services have been completed. Each survey has three (3) federally mandated questions with a scoring scale.
2. Employers are interviewed once services have been completed. Each survey has three (3) federally mandated questions with a scoring scale.

WIA §136 (b)(2)(A)

2. **Dislocated Worker and National Emergency Grant Programs** – The purpose of the Dislocated Worker Program is to provide core, intensive, and training services to dislocated workers who need employment, education, training or support services under WIA Title I programs.

Dislocated Worker Program Elements

This program provides core, intensive, and training services through the One-Stop Career Center System for the two workforce program clients: job seekers and employers. The WIA goal of universal access is achieved, from among other strategies, through close integration of services provided by the Wagner-Peyser, WIA Adult and Dislocated Worker partners, and other partners in the One-Stop Career Center.

National Emergency Grant Program Elements

The purpose of National Emergency Grants is to provide supplemental dislocated worker funds to LWIAs and other eligible entities in order to respond effectively to workers and communities affected by major economic dislocations and other dislocation events which cannot be met with formula allotments.

The services to be provided in the Dislocated Worker and National Emergency Grant programs, as initially shown in the introduction to this review guide, include:

Dislocated Worker Program Eligibility

The following is a description of eligible dislocated workers under WIA. Individuals must meet the following criteria: *E&T Policy Memo 00-10*

1. Has been terminated or laid off, or who has received a notice of termination or layoff, from employment.
2. Is eligible for or has exhausted entitlement to unemployment compensation; or
3. Has been employed for a duration sufficient to demonstrate, to the appropriate entity at a one-stop center referred to in WIA section 134(c), attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a State unemployment compensation law; and
4. Is unlikely to return to a previous industry or occupation.
5. Has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise;
6. Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or
7. For purposes of eligibility to receive services other than training services described in WIA section 134 (d)(4), intensive services described in WIA section 134 (d)(3), or supportive services; and is employed at a facility at which the employer has made a general announcement that the facility will close.
8. Was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters; or
9. Is a displaced homemaker. The term “displaced homemaker” means an individual who has been providing unpaid services to family members in the home and who; (A) has been dependent on the income of another family member but is no longer supported by that income; and (B) is

unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

Workforce Investment Act Technical Assistance Manual

WIA §101 (9) (A-D)

WIA §101 (10) (A-B)

Dislocated Worker Program: National Emergency Grants

National Emergency Grants are provided through WIA in order to deliver the following employment and training activities:

1. To provide employment and training assistance to workers affected by major economic dislocations, such as plant closures, mass layoffs, or closures and realignments of military installations;
2. To provide assistance to the Governor of Tennessee within the boundaries of which is an area that has suffered an emergency or a major disaster as defined in paragraphs (1) and (2), respectively, of section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5122 (1) and (2))
3. To provide disaster relief employment in the area; and to provide additional assistance to a State or local board for eligible dislocated workers in a case in which the State or local board has expended the funds provided under this section to carry out activities described in paragraphs (1) and (2) and can demonstrate the need for additional funds to provide appropriate services for such workers, in accordance with requirements prescribed by the Department of Labor.

WIA §173 (a)(1-3)

Dislocated Worker Program Eligibility: National Emergency Grants

Eligibility criteria for employment and training assistance under National Emergency Grants are that an individual must be:

1. A dislocated worker;
2. A civilian employee of the Department of Defense or the Department of Energy employed at a military installation that is being closed, or that will undergo realignment, within the next 24 months after the date of the determination of eligibility;
3. Is a long-term unemployed individual, or is temporarily or permanently laid off as a consequence of a disaster.
4. An individual who is employed in a non-managerial position with a Department of Defense contractor, who is determined by the Secretary of Defense to be at-risk of termination from employment as a result of reductions in defense expenditures, and whose employer is converting operations from defense to non-defense applications in order to prevent worker layoffs; or

5. A member of the Armed Forces who-- (I) was on active duty or full-time National Guard duty; (II) is involuntarily separated (as defined in section 1141 of title 10, United States Code) from active duty or full-time National Guard duty; or is separated from active duty or full-time National Guard duty pursuant to a special separation benefits program under section 1174a of title 10, United States Code, or the voluntary separation incentive program under section 1175 of that title;
6. Is not entitled to retired or retained pay incident to the separation; and
7. Applies for such employment and training assistance before the end of the 180-day period beginning on the date of that separation.

WIA §173 (c)(2)(A)(i-iv)

WIA §173 (d)(2)

Dislocated Worker and NEG Eligibility Documentation

PAR should ensure that eligibility is verified. The WIA Title I program is delivered statewide through the One-Stop Career Center system which provides universal access to participants who are adults, youth, dislocated workers, and employers. The allowable use of funds is determined by the eligibility criteria for each specific program or funding stream, and the individuals needs. Dislocated Workers who need WIA services must provide:

1. Social Security Number
2. Proof of Citizenship or Permanent Residency Card
3. Work Permit Issued by Immigration and Naturalization Service
4. Self-employment documents such as tax forms
5. Divorce papers for displaced homemakers
6. Proof of UI benefits or qualification for UI benefits
7. Layoff papers showing loss of employment
8. Receipt of Nondiscrimination Documents, with Signature of Participant
9. When funds for adult programs are limited (75% expended by 3rd Quarter) proof of income or qualifying disability is an eligibility requirement ***E&T Memo 03-25***

Please note that the records needed to comply with requirements 1 through 3 shown above may vary. However, documentation of 1 through 3 shown above, at a minimum, may consist of one item from List A, **or** one each of the items from List B and List C of **Exhibit 10**.

WIA/CMATS Program Manual

Workforce Investment Program Technical Assistance Manual

Exhibit 10

Additional Eligibility Guidelines for PAR

The preceding factors supersede the application of any of the following dislocated worker criteria (Exception: displaced homemakers and self-employed) and could affect eligibility:

1. Individuals who are unable to work for any reason and such condition can be documented are not considered eligible.
2. Individuals who are terminated or laid-off for cause are not eligible for dislocated services.
3. Individuals are not eligible if the closing or layoff constitutes a strike or lock-out.
4. Individuals who voluntarily terminate (quit) their employment are not eligible for dislocated services as a result of that dislocation.
5. The situation outlined in the last two circumstances above would not prevent an applicant from receiving dislocated worker services if the individual is awarded UI benefits as a result of mitigating circumstances surrounding the termination for cause or voluntary termination.
6. Applicants who are laid-off with recall rights should not be excluded from dislocated worker services based solely on the recall factor. This situation will apply primarily to organized labor with employment contracts.
7. Applicants shall not be considered eligible for dislocated worker services if the applicant has been dislocated for five or more calendar years from the date of attempted certification.
8. Applicant's termination must be permanent in nature.

Dislocated Worker and NEG Program Service Providers

In addition to the service provider guidelines introduced in Section 1. of this review guide, it is **IMPORTANT** for PAR to note that, in the National Emergency Grant program, approved service providers may not be listed in the preliminary list of approved providers as published by THEC.

Dislocated Worker and NEG Program Outcomes and Reporting

The state plan, as well as each LWIA plan, includes information regarding goals for each performance measure and how services will be provided in order to achieve successful outcomes for each measure. Federal guidance describes the opportunity for additional program funds if performance goals are successfully achieved. There also are possible sanctions if performance goals are not met. Please see the attached *Table for State Performance Indicators and Goals*; and for reporting parameters, please see the associated *Table for Data Capture and Reporting*.

Four (4) required performance measures apply to adult and dislocated worker programs for reporting outcomes, plus two (2) additional measures which apply to all youth, adult, and dislocated workers served by WIA 1998, as follows:

1. Entry into unsubsidized employment.
2. Retention in unsubsidized employment six months after entry into the employment.
3. Earnings received in unsubsidized employment six months after entry into the employment.
4. Attainment of a recognized credential by participants who enter unsubsidized employment.

20 CFR 666.100(a)(1)
E&T Memo 01-14

1. Participants are interviewed once services have been completed. Each survey has three (3) federally mandated questions with a scoring scale.
2. Employers are interviewed once services have been completed. Each survey has three (3) federally mandated questions with a scoring scale.

WIA §136 (b)(2)(A)

3. **Youth Program** – The purpose of the WIA youth program is to improve the delivery of services to young people, assisting them with the transition, expectations and skills needed for success in the workplace. The law calls for close linkages to local labor market needs and community youth programs and services, and with strong connections between occupational and academic learning. Youth programs include activities that promote youth development and citizenship, such as leadership development through community service opportunities; adult mentoring and follow-up; and targeted opportunities for youth living in high poverty areas.

Youth Program Elements

Ten program elements are required by law to be available to all eligible youth participating in WIA: **WIA §129 (c)(2)**

1. Tutoring, study skills training, and instruction leading to completion of secondary school, including dropout prevention strategies.
2. Alternative secondary school services.
3. Summer employment opportunities linked to academic and occupational learning. Note: No separate summer program on allocation. Summer employment opportunities are to be one component in a year-round design. Summer employment opportunities must not be a stand-alone program separate from the

- year-round youth program and must include a follow-up service for a minimum of 12 months.
4. Paid/Unpaid work experiences. Note: Work experience can be in the public or private sector and must be tied to the student's academic and career goals.
 5. Occupational skill training integrated with career goals.
 6. Supportive Services
 7. Leadership development opportunities.
 8. Adult mentoring for not less than 12 months. Note: Mentoring can be during and after program participation.
 9. Follow-up services for no less than 12 months. Note: Follow-up services are after program participation and are required elements for all youth enrolled in WIA.
 10. Comprehensive guidance and counseling.

Each LWIA is responsible for identifying providers through a competitive bid process. This past year, the 13 LWIAs identified over 100 different providers. Providers included K through 12, post-secondary, technology schools, community-based organizations, and faith-based organizations, and human resource agencies.

Youth Program Eligibility

The following is a description of eligible youth under WIA. Individuals must meet the following criteria: **20 CFR Subpart B 664.200**

1. Ages 14 – 21
2. Economically disadvantaged (up to 5% of the funds allocated to an LWIA may be used for youth that do not meet the income criteria),

And one of the following: **20 CFR Subpart B 664.220**

1. Deficient in basic literacy skills.
2. School dropout.
3. Homeless, runaway, or a foster child
4. Pregnant or a parent.
5. Offender
6. Requires additional assistance to complete an education program or to secure employment (as defined in the LWIA plan).

Youth Eligibility Documentation

Eligibility is determined in a number of ways and can include: through the transfer of school records, income documentation, birth certificate, or participant statements. PAR should expect to see if eligibility has been verified, but due to the volume of youth participants, it is recommended that a 15% sample of records should be examined.

Additional Youth Eligibility Criteria

WIA does require that, of all eligible youth served, 30% of the funding is to be used to serve out-of-school youth. Out-of-School youth are defined as: **20 CFR Subpart C 664.300-320**

1. Ages 18 – 21.
2. Economically disadvantaged (up to 5% of the funds allocated to an LWIA may be used for youth that do not meet the income criteria).

And one of the following:

1. School dropout.
2. High school graduate.
3. Holder of a GED, but is one of the following:
 - Basic skills deficient.
 - Unemployed or underemployed

Allowable Activities: Focus Areas

For accountability purposes, each LWIA is required to establish a Youth Council, which serves as an advisory board to the full Workforce Board. **WIA §117 (h)** Youth Council responsibilities include:

1. Developing parts of the local plan relating to eligible youth, as determined by the chair of the LWIB.
2. Recommending eligible service providers to be awarded grants on a competitive basis to carry out youth activities under WIA, subject to approval of the LWIB.
3. Conduct oversight with respect to eligible providers of youth services in the local area.
4. Coordinate youth activities that include:
 - Provide eligible youth seeking assistance in achieving academic and employment success, effective and comprehensive activities, which shall include options for improving educational and skill competencies and provide effective connections with employers.
 - Ensure ongoing mentoring opportunities with adults.
 - Provide opportunities for training.
 - Provide incentives for recognition and achievement.
 - Provide opportunities in activities related to leadership development, decision-making, citizenship, and community service.
 - Other duties determined appropriate by the chair of the LWIB.

Mandatory Youth Council Membership

1. LWIB Members – Are members of the local board with special interest or expertise in youth policy. This includes LWIB members both public and private with special interest or expertise in youth policy (if present on the board).
2. Youth Service Agencies – Are representatives of youth services, such as juvenile justice and local law enforcement agencies.
3. Public Housing Authorities – Local housing authorities.
4. Parents of Eligible Youth – Are parents of eligible youth seeking assistance under this subtitle.
5. Former Customers/Representatives – Are individuals including former participants, and representatives of organizations that have experience relating to youth activities.
6. Job Corps – Are Job Corp representatives (if appropriate).
7. Other Partners/Representatives – Are other members which may include other representatives as the chairperson of the LWIB, in cooperation with the chief local elected official, determines to be appropriate.

Youth Program Outcomes and Reporting

The state plan, as well as each LWIA plan, includes information regarding goals for each performance measure and how services will be provided in order to achieve successful outcomes for each measure. Federal guidance describes the opportunity for additional program funds if performance goals are successfully achieved. There are also possible sanctions if performance goals are not met. Please see the attached *Table for State Performance Indicators and Goals*; and for reporting parameters, please see the associated *Table for Data Capture and Reporting*.

Seven (7) required performance measures apply to youth programs for reporting outcomes, plus two (2) additional measures which apply to all youth, adult, and dislocated workers served by WIA 1998, as follows: **WIA § 136 (b)(2)(A)**

1. Older Youth (Age 19-21) **20 CFR 666.100 (a)(3)(ii)**
 - Entry into unsubsidized employment.
 - Retention in unsubsidized employment six months after entry into the employment.
 - Earnings received in unsubsidized employment six months after entry into the employment.
 - Attainment of a recognized credential relating to achievement of educational skills which may include attainment of a secondary school diploma or its recognized equivalent, or occupational skills, by participants who enter unsubsidized employment or

who enter post-secondary education, advanced training or unsubsidized employment. *E&T Memo 01-04*

2. Younger Youth (Age 14-18) **20 CFR 666.100 (a)(3)(I)**

- Basic skills attainment, and as appropriate, occupational skills attainment or work readiness skills attainment.
- Attainment of high school diploma or GED.
- Placement and retention in post-secondary education, advanced training, or employment, apprenticeships, or placement in the military.

3. Surveys

- Participants are interviewed once services have been completed. Each survey has three (3) federally mandated questions with a scoring scale.
- Employer are interviewed once services have been completed. Each survey has three (3) federally mandated questions with a scoring scale.

WIA § 136 (b)(2)(A)

4. **Statewide Programs**

Jobs for Tennessee Graduates

The Jobs for Tennessee Graduates (JTG) program is a collaborative effort of the Tennessee Department of Labor and Workforce Development and the Tennessee Department of Education. The program is designed to assist at-risk/disadvantaged youth in graduating from high school and finding and keeping quality jobs. The purpose of JTG is to focus on career development, job attainment, job survival, basic skills, leadership and self-development and personal skills. Upon meeting these personal and work-related skills, JTG meets the ten program elements established in WIA section 129 (c)(2). These elements encompass the overall issues of educational achievement, employment preparation, leadership development and support services.

Local high schools provide both multi-year and senior year school-to-work programs. There is an additional drop-out recovery program that serves older youth who have dropped-out of high school and are seeking GED or equivalent credentials.

AFL-CIO Labor Council's Technical Assistance Program (TAP)

TAP is a dislocated worker program that provides technical assistance to labor unions and workers throughout Tennessee. It is a special project of the Tennessee AFL-CIO Labor Council with the cooperation and assistance of the Tennessee Department of Labor and Workforce Development. Through the program, dislocated workers are provided training activities that relate to problems they are facing in their time of need.

The TAP provides training activities that relate to the problems of workers whose place of employment is closed due to economic factors. The program has been structured and activated to respond to human needs and hardship incurred by the loss of jobs. The impact of unemployment and the pervasive economic damage resulting from plant shutdown weakens the human spirit and deprives families and their communities of the dignity and stability required in remaining healthy and productive. The TAP mission is:

- To serve the needs of dislocated workers by providing assistance in obtaining safe, satisfying, and productive jobs that support family living standards.
- To provide appropriate consultation and assistance related to rapid response through awareness of potential layoffs or plant closing, and on-going assistance in the formation and operation of labor management committees and transition efforts.
- To provide leadership in the community by conveying information about the availability of WIA services.
- To effectively disseminate the benefits resulting from program participation in early re-adjustment, with emphasis on enhancing basic skills and training.

The TAP will coordinate with "Working for America Institute" on its activities in WIA and Rapid Response services. Staff will attend Human Resources Development conferences and workshops throughout the year. In addition, TAP has projected a yearly activity plan that will be updated quarterly.

Plans also are underway for the TAP to be computerized in order to have the capabilities of being online with the Tennessee Department of Labor and Workforce Development, US Department of Labor, Economic and Community Development, and any other public or private organization that will assist dislocated workers.

Tennessee Higher Education Commission (THEC)

THEC's role with the Local Workforce Investment Boards include certifying eligible providers to be participants on the state provider list, storing student records from closed institutions or discontinued programs of institutions located in their respective local area, and assuring that no institution may solicit, recruit,

award credentials, or operate as an Eligible Training Provider until such certification is granted by the Local Workforce Investment Board. Specific roles of the commission are listed below:

- Annually grant subsequent eligibility of providers by analyzing performance data.
- Conduct state-level appeals to determine whether or not a denied provider should be deemed eligible to participate on the State Provider List.
- Perform site visits to review, inspect and investigate as necessary, institutions holding a certification for participation.
- Work in conjunction with the Local Workforce Investment Boards to establish a deadline for submission of initial certification application packages, new program applications, and tracking information.
- Provide Local Workforce Investment Boards, state or federal agencies information pertaining to school closures under any condition.
- Provide Local Workforce Development Boards with performance reports on training providers.

Special Statewide Programs

Please note that special statewide programs may be implemented periodically under contracts during the state fiscal year. These contracts need to be scheduled for review by PAR in accordance with the regular review schedule for contracts listed on **Attachment B**. It is anticipated that these contracts and programs will involve participant services, and thus need to review using the guidelines for adult, dislocated worker/NEG, and/or youth programs.

Statewide Programs Eligibility Criteria

Eligibility for these programs is the same as in the other WIA programs or funding streams (Adults, Dislocated Worker, and Youth). However, the skill shortage grants eligibility criteria are somewhat different since the services are geared toward skill-specific training. Additional information regarding each statewide program is inserted in the *Workforce Investment Program Technical Assistance Manual*. Additional questions about these programs also are submitted for PAR in updates to the review guides utilized by the F&A monitors.

Statewide Programs: Focus Areas, Policies, and Test Sampling

Additional information and questions regarding each specific statewide grant or activity may be found in the state contract. Further, generic questions about these grants will be submitted to the PAR office for inclusion in the monitoring instrument used by F&A monitors. Also, WIA federal regulations do not specify what percentage or how many of the participant files should be reviewed. If the standard review PAR conducts is 20%, it should be adequate.

Statewide Programs Outcome Measures

The state plan, as well as each LWIA plan, includes information regarding goals for each performance measure and how services will be provided in order to achieve successful outcomes for each measure. Federal guidance describes the opportunity for additional program funds if performance goals are successfully achieved. There also are possible sanctions if performance goals are not met. Please see the attached *Table for State Performance Indicators and Goals*; and for reporting parameters, please see the associated *Table for Data Capture and Reporting*.

Outcomes for statewide funded programs are conducted in two ways. Contracts or funds that provide direct participants services; such as core, intensive, and training services, will be calculated for performance measures. If the contract provides core services for adults, the adult program performance measures will apply. If the contract provides direct services to dislocated workers, the dislocated worker/NEG performance measures will be used, and similarly for the youth program contracts. Please see the performance measures segments of this guide.

For contracts that do not provide direct participant services, but provide administrative types of services, such as the AFL-CIO, University of Memphis, or THEC contracts, performance measures will not apply. At the end of each contract year, the state will evaluate the terms of the contracts and make decisions whether to continue or discontinue contracting with the entities.

5. Incentive Grants

These grants are provided to States in recognition of performance that exceeds negotiated levels. The purpose of incentive grants is to carry out one or more innovative programs under WIA Title I, WIA Title II, or the Carl D. Perkins Vocational and Technical Education Act. Local incentive grant funds may be used for any of these activities, and other activities with the written approval of the Department of Labor and Workforce Development. Not all incentive funds are spent on participants, but if an LWIA's plan for incentive funds reflects participant services, then the incentive contract needs to be reviewed using the same guidelines as regular adult, dislocated worker, and/or youth program contracts.

WIA § 503 (a)
20 CFR 666.410

6. WIA Memoranda of Understanding (MOU)

Section 662.310 of the federal WIA regulations provides that the local areas may develop a single umbrella MOU covering all partners and the Local Board, or separate MOUs between partners and the Local Board. Due to the rapid

expansion of the Tennessee Career Center System (more than 50 affiliate sites to complement the 14 original comprehensive career centers); the department opted to institute the single umbrella approach.

It was envisioned this process would assist both the Grant Authority and the Local Workforce Investment Boards by: (1) Allowing a partnering agency's Duration of Term to extend until the parties mutually agree to modify the agreement, (2) Streamlining the signatory process, and (3) Providing a simpler, yet more comprehensive composite of the Local Career Center System by delineating each partnering agency's contribution by each individual county Career Center facility.

Statutory requirements for the instrument are as follows:

1. The services to be provided through the one-stop delivery system;
2. How the costs of such services and the operating costs of the system will be funded;
3. The duration of the MOU;
4. The procedures for amending the memoranda during the term of the memoranda;
5. Methods for referral of individuals between the one-stop operator and the one-stop partners, for the appropriate services and activities; and
6. Such other provisions, consistent with the requirements of this Title, as the parties to the agreement determine to be appropriate.

The MOU contain the following elements:

1. MOU Boilerplate: Each partnering agency is listed under 'Parties to this agreement.'
2. Partner's MOU: Each party to the agreement's individual component consist of the following elements-
 - Cover Sheet identifying the partnering agency by name, address, and contact person;
 - Special Terms and Conditions Page allowed by the agency's contractual regulations to include a page labeled 'Special Terms and Conditions.'
3. Letter of Confirmation which indicates which required partners are not included due to the services not being available in the LWIA.
4. Signatory Sheet consisting of the Local Workforce Investment Board Chairperson, the Local Chief Elected Official(s) Chairperson, and the signature authority of all partnering agencies.
5. Executive Summary containing an executive summary as follows-
 - Attachment A which is a rollup of all partner's program or service provided, how the services will be provided, methods of referral, and personnel positions by title, part-time or full-time (if part-time, scheduled hours/days) by individual county facility.
 - Attachment B which is the Local Career Center System total budget rollup showing the source, amount of the funds and

allocation method(s), and indirect costs, by each partnering agency by county facility; and

- Attachment C which is a Local Career Center System total budget rollup depicting the partner agencies' total contribution.

Performance Outcome Measures

The WIA specifies core indicators of performance for workforce investment activities in adult, dislocated worker, and youth programs. Fifteen core measures apply to the adult, dislocated worker and youth programs, and two measures of customer satisfaction apply across these three funding streams, for a total of 17 required measures. **PAR will not verify outcome data, only the process to gather the outcomes will be reviewed.** For additional information, and a table of performance measures, please refer to **Exhibit 3**.

The outcomes are supported by the contracts in that the State Plan, as well as each local workforce area plan includes information regarding goals for each performance measure and how services will be provided in order to achieve successful outcomes for each measure. Federal guidance describes the opportunity for additional program funds if performance goals are successfully achieved. There also are possible sanctions if performance goals are not met.

Career Center Fiscal Guidelines and Reporting

The Memorandum of Understanding which is implemented for each of the Career Centers is merely an agreement between the agencies as to the distribution of costs basis for various cost items. There are many types of agencies involved in the agreement. There are no required reports, no closeout reports, and no one method of payment delivery. Each may require different procedures depending on which agency is making lease payments or has a majority of shared staff working in the Career Center. Most of the questions do not apply to this type of agreement.

7. Corrective Action Procedures

Upon the receipt of monitoring reports from PAR, E&T staff review the report, and when findings and/or observations are reported, an official letter requesting corrective action is promptly sent to the sub-recipient. Sub-recipients are provided 30 days in which to respond with appropriate actions in order to resolve the findings and/or observations. The sub-recipient also is provided with Technical Assistance to help to resolve the issues.

Subrecipient: _____ Monitor: _____
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**F & A/RDS/PROGRAM ACCOUNTABILITY AND REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT
WORKFORCE INVESTMENT ACT**

**LOCAL WORKFORCE INVESTMENT DESKTOP CONTRACT REVIEW
QUESTIONNAIRE Reference Sheet**

Question		Reference(s)	Parameters
1.	Is a current, fully executed, WIA contract, and all amendments, at the LWIA administrative office? (Main office)	29 CFR 97.20 (b)(2)	Please refer to WIA contract in administrative office with the necessary amendments in place
2.	Is the formal recipient of the WIA contract the chief elected official of the general local government, and if not, who is the grant recipient? (Main office)	WIA sec. 117(d)(3)(B)(i)(I)	Please refer to WIA contract for signature of chief elected official of local government, if there is another grant recipient another signature should be on the contract.
3.	Is the WIA contract a cost reimbursement contract, and if not, then what type? (Main office)	WIA sec. 184(a)(3)(B)	If the WIA contract is not a cost reimbursement contract then please indicate what type it is; review contract for confirmation
4.	Does the fully executed contract contain a Conflict of Interest clause pertaining to LWIA employees, if not, does the LWIA maintain written codes? Refer to 13.	29 CFR 97.36(b)(3)(i-iv)	Please review contract for section relating to Conflict of Interest pertaining to LWIA employees. Cross reference with Conflict of Interest forms signed by employees.
5.	Does the LWIA have a documented system of contract administration which ensures that subcontractors perform within the terms of their subcontracts?	29 CFR 97.36(B)(3)	Review LWIA monitoring procedures for subcontractors
6.	If the LWIA is newly designated, (within the last program year) does it have documents on file to show designation by the Governor? (Main office)	20 CFR 661.250	Please review approval letter from Governor officially designating the LWIA.
7.	Does the LWIA is have on file a current, fully executed, MOU between the LWIB and the One-Stop Career Center partners in the LWIA?	WIA sec.118(b)(2)(B), Sec.121(a),(c),(e)	Please refer to MOU agreement between LWIA and One-Stop Career Center partners if LWIA has been newly designated within the last program year.
9.	Are there any other current, fully executed grants, contracts, or cooperative agreements awarded to the LWIA and funded under WIA 1998?	WIA sec. 171-172	Please review other WIA funded grants , contract, or cooperative agreements such as IWT, skill shortage, any new since
10.	Do members of the business community represent at least 51 percent of the Local Workforce Investment Board? (Main office)	20 CFR 661.200(e)	Please refer to list of current local board members on LWIA website, cross reference list with records in local administrative office and records on file with the LWIB coordinator.
11.	Is the Board chairperson a business representative? (Main office)	20 CFR 661.200(g) WIA Section 111(c)(i)	Please refer to nomination application on file at local administrative office, and application on file with the LWIB coordinator.

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 WORKFORCE INVESTMENT ACT**

**LOCAL WORKFORCE INVESTMENT DESKTOP CONTRACT REVIEW
 QUESTIONNAIRE Reference (cont.)**

Questions		Reference	Parameters
12.	Is the Board represented by at least two members from Education, Labor, CBO's, or Economic Development?	<i>WIA sec. 111(b)(1)(C)(iii)-(v)</i>	Please review local board member list on LWIA website and cross reference with local administrative records and the LWIB coordinator.
13.	Do all local board members have the necessary Conflict of Interest, and Disclosure documentation signed and on record?	<i>WIA sec. 117(g)(1)(A)(B)(2) TN Comptrollers office</i>	Please review documentation on file with local administrative office, and documentation on file with LWIB coordinator.
14.	Are the required One-Stop Partners represented on the Local Board?	<i>WIA sec. 117(b)(2)(A)(i-vi) WIA Sec. 111(b)(1)(c)(iv)(I)</i>	Please refer to list of current local board members on LWIA website, cross reference list with records in local administrative office and records on file with the LWIB coordinator.
15.	Is there evidence that the Board has met at least once a year?	<i>WIA sec. 117(2)(d)(1) State Planning Guidance</i>	Please review local board meeting minutes on file at administrative office.
16.	Are local board meetings open to the public and announced in advance?	<i>WIA sec. 117(e) State Planning Guidance</i>	Please refer to public notices issued on local board's website and in local newspaper. Administrative office should have this accessible to the monitor.
17.	Has the Board coordinated with local economic development?	<i>20 CFR 661.305 (a)(7) State Plan</i>	Provide information on coordination efforts
18.	Has the Board established a youth council as a subgroup or subcommittee of the Board?	<i>WIA sec. 117(h)</i>	Please inquire about local youth council with Youth Coordinator, confirm recommendations are made to Board
19.	Is the Youth Council represented by: ▪ Members of the local Board with special interest or expertise in Youth Policy, or ▪ Members of juvenile justice and law enforcement, or ▪ Individuals or former participants of youth service organizations, or ▪ Members of Job Corps	<i>WIA sec. 117(h)(2)(A)-(B)</i>	Please inquire about local youth council with Youth Coordinator.
20.	Is the Youth Council: ▪ Developing the portions of the local plan relating to eligible youth, or ▪ Recommending eligible providers for competitive grants or contracts, or ▪ Conducting oversight of eligible youth providers, or ▪ Coordinating youth activity	<i>WIA sec. 117(h)(4)(A)-(C)</i>	Please inquire about local youth council with Youth Coordinator, and review current local plan or LWIB minutes

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REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT
WORKFORCE INVESTMENT ACT**

**LOCAL WORKFORCE INVESTMENT DESKTOP CONTRACT REVIEW
QUESTIONNAIRE Reference Sheet (cont.)**

Questions		Reference	Parameters
21.	Has the local Board entered into an MOU with the One-Stop? And, are roles and responsibilities clearly defined?	<i>WIA sec. 121 (a)(1)</i>	Please refer to the MOU agreement on file with the local administrative office
22.	Is the designated One-Stop entity eligible to receive funds under WIA 1998, as follows: <ul style="list-style-type: none"> ▪ Designated through either a competitive process or through a consensus reached by the LWIA partners ▪ Is a public or private entity, or consortium of entities with demonstrated effectiveness ▪ Is not an elementary or secondary school, except Nontraditional public schools and area vocational schools (Main office)	<i>WIA sec. 121 (d)(1)-(3)</i> <i>State Planning Guidance</i>	Please refer to One-Stop eligibility list and confirm that listed provisions are being provided.
23.	Did the Board provide at least a 30 day comment period on all plans or modifications to plans? (Main office)	<i>WIA sec. 118(c)(2)</i> <i>State Planning Guidance</i>	Please refer to public notice on website or in local newspaper.
24.	Has the Board identified and do they maintain, the list of eligible youth services, training, and intensive training providers in the LWIA, and cost and performance data?	<i>WIA sec. 117(d)(2)(C)-(D)</i>	Please refer to eligible youth provider list at local administrative office.
25.	Are there any youth service, training and /or intensive training providers on the list, who are determined to be ineligible?	<i>WIA sec. 117(d)(2)(C)-(D)</i>	Please refer to eligible youth provider list at local administrative office; also reference documentation determining eligibility
26.	Has the Board established conflict of interest provisions?	<i>WIA sec. 117(g)</i>	Please refer to LWIB Bylaws available at local administrative office.
27.	Is the local board or its staff providing training?	<i>WIA sec. 117 (f)(B)(i)-(iii)</i>	Please confirm services provided with administrative office

Subrecipient:

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**LOCAL WORKFORCE INVESTMENT DESKTOP CONTRACT REVIEW
QUESTIONNAIRE Reference Sheet (cont.)**

Questions		Reference	Parameters
28.	If yes to 27. (a), (b), or (c) is there an agreement between the CEO and the Governor? (Currently only LWIA 2 and 12) (Main office)	<i>WIA sec. 117(f)(B)(i)-(iii)</i>	Please refer to such agreement provide by administrative entity. (Waiver letter)
29.	Does the local Board and LWIA have a documented system and set of documented procedures for yearly program and financial oversight and monitoring each service provider named in the MOU?	<i>20 CFR 667.410(a)</i>	Please review documentation of procedures and measures used to monitor
30.	Does the LWIA have documents which show designation by Governor as the formal contract recipient?	<i>20 CFR 661.250</i>	Please review designation letter signed by Governor
31.	Has the local Board established additional local performance measures?	<i>WIA sec. 117(d)(5)</i> <i>20 CFR 661.305(a)(5)</i>	Review if applicable
30.	Does the LWIA have on file a current, fully executed MOU between the LWIB and the One-Stop Career Center partners in the LWIA?	<i>WIA sec. 184(b)(2)(B)</i>	Please review MOU and provisions provided by administrative entity
31.	Does the MOU contain the following provisions? ▪ Descriptions of services provided ▪ Funding and operating costs ▪ Methods for referral of individuals between operators and providers ▪ Procedures for amending the MOU	<i>20 CFR 667.135(a)(2)</i>	Please review MOU and provisions provided by administrative entity

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UNIFORM ADMINISTRATION DESTOP REVIEW Reference Sheet**

Subrecipient: _____ Monitor: _____
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Subrecipients must maintain records which adequately identify the source and application of funds provided for financially-assisted, WIA activities. 31 USC; OMB Cir. A-133

Question		Reference(s)	Parameters
1.	Have any of the LWIA's programs, which exceed \$500,000 in WIA funding, been audited during the past two years?	<i>31 USC sec. 7502; OMB Cir. A-133</i>	Please reference performance accountability reports/ corrective action plans on file with the administrative office.
2.	If so, have all audit reports been sent to grantor agencies?	<i>31 USC sec. 7502; OMB Cir. A-133</i>	Please cross-reference the LWIA administrative office and grantor agency for verification
3.	Does the LWIA annually authorize all bank accounts and check signatories?	<i>TDOLWD Financial Management Handbook, Provision 4, p. 12</i>	Please verify with current bank documentation of authorization and check signatories at LWIA and compare to TDOL fiscal office
4.	Is incoming mail opened and are receipts listed by persons having no access to cash receipts or accounts receivable records?	<i>TDOLWD Financial Management Handbook, Provision 4, p. 12</i>	Please verify this process with LWIA administrative management staff
5.	Are pre-numbered cash receipts prepared?	<i>TDOLWD Financial Management Handbook, Provision 4, p. 12</i>	Please refer to receipt book for all transactions
6.	Are receipts deposited intact on a daily basis and collection documentation totals compared to bank deposits and posting to cash receipts journals?	<i>TDOLWD Financial Management Handbook, Provision 8, p. 16</i>	Please review past receipts and daily log of transactions/ consult administrative staff
7.	Do adequate physical controls exist over cash receipts from the time of mail opening until the time of bank deposit?	<i>TDOLWD Financial Management Handbook p. 3, & Provision 4, p. 12</i>	Please review past receipts and daily log of transactions /consult administrative staff for description of control process, and safeguards
8.	Is the general cashier function segregated from the general ledger and subsidiary ledger functions?	<i>TDOLWD Financial Management Handbook, Provision 8, p. 16</i>	Please review procedures For all ledger functions and transactions, consult administrative staff for description of control process

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UNIFORM ADMINISTRATION DESKTOP REVIEW Reference Sheet (cont.)

Subrecipient: _____ Monitor: _____
Grant/Contract No: _____ Funding/Service: _____ Date of Visit _____

Question		Reference(s)	Parameters
9.	Is the cashing of checks out of currency receipts prohibited?	<i>TDOLWD Financial Management Handbook, Provision 8, p. 16</i>	Please review past receipts and daily log of transactions/ consult administrative staff
10.	Are all disbursements, except from petty cash, made by check?	<i>TDOLWD Financial Management Handbook, Provision 8, p. 16</i>	Please review procedure / policy related to disbursements
11.	Are physical and accounting controls over unauthorized use of bank check stock adequate?	<i>TDOLWD Financial Management Handbook, Provision 8, p. 16</i>	Please review accounting controls policy / procedures, ie., lockbox, vault, etc.
12.	Are checks prepared by specific employees who are independent of voucher/invoice approval?	<i>TDOLWD Financial Management Handbook, p. 3, Provision 8, p. 16</i>	Refer to list of employees authorized to prepare checks
13.	Do employees preparing checks compare all data on voucher and support to checks?	<i>TDOLWD Financial Management Handbook, p. 3, Provision 8, p. 16</i>	Please review procedural task assigned to employees designated as check preparers
14.	Are all checks, disbursement vouchers, or check requests approved for payment by the check signatory or other responsible employee?	<i>TDOLWD Financial Management Handbook, p. 3, Provision 8, p. 16</i>	Please review list of employees designated as check signatory, and the procedural tasks assigned to this position
15.	Is some type of check protector used?	<i>TDOLWD Financial Management Handbook, p. 3, Provision 8, p. 16</i>	Consult individual designated as check signatory, ie., check covering or book
16.	Are voided/spoiled checks properly mutilated and retained?	<i>TDOLWD Financial Management Handbook, Provision 8, p. 16</i>	Consult individual designated as check signatory, ie., rubber stamp to void

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Subrecipient: _____ Monitor: _____
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Questions		Reference(s)	Parameters
17.	Is signing blank checks prohibited?	<i>TDOLWD Financial Management Handbook, p. 3, Provision 8, p. 16</i>	Review policy and/or procedures regarding blank checks, consult check signatory
18.	Are reconciliations of bank statements made by someone other than person who participated in the receipt of disbursement cash?	<i>TDOLWD Financial Management Handbook, Provision 8, p. 16</i>	Consult individuals responsible for reconciliation of bank statements
19.	Are cancelled checks examined thoroughly for authorized signatures, alterations and irregular endorsements?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Consult administrative staff, accountants, review procedural tasks regarding cancelled checks
20.	Are completed bank reconciliations reviewed by a responsible official?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Consult administrative staff to determine the qualifications of the individual responsible
21.	Are outstanding checks periodically investigated and payments stopped if necessary?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Consult administrative staff regarding procedures for outstanding checks
22.	Are disbursement vouchers involving payables checked against the purchase order and receiving report?	<i>TDOLWD Financial Management Handbook, p. 3, Provision 8, p. 16</i>	Consult administrative staff/ accountants regarding this procedure
23.	Are invoices properly marked to avoid duplicated payments?	<i>TDOLWD Financial Management Handbook, p. 3, Provision 8, p. 16</i>	Consult administrative staff/ accountants regarding this procedure
24.	Does the organization have defined cutoff procedures, and are they continually monitored by the appropriate person?	<i>TDOLWD Financial Management Handbook, Provision 2, p. 9</i>	Consult administrative staff/ accountants regarding this procedure

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Subrecipient: _____ Monitor: _____
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Questions		Reference(s)	Parameters
25.	Do accounting procedures, charts of accounting procedures, charts of accounts, etc., provide for identifying receipts and expenditures of program funds separately for each program?	<i>TDOLWD Financial Management Handbook p.3</i>	Please review accounting procedures with administrative staff and accountant
26.	Is there a documented time schedule for filing invoices and/or financial reports with grantors?	<i>TDOLWD Financial Management Handbook Provision 2, p.9</i>	Please review time schedule which should be provided by accountant or administrative staff
27.	Are reconciliations of grant invoices and /or financial reports with supporting accounting records prepared, reviewed and approved by responsible officials before filing?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please review accounting procedures with administrative staff and accountant
28.	Are grant invoices and draw-down requests submitted in accordance with terms specified in the contract?	<i>TDOLWD Financial Management Handbook Provision 2, p.9</i>	Please cross reference grant invoices with terms of contract, discuss with TDOL
29.	Do invoices agree with the supporting financial records and ledgers maintained by the LWIA?	<i>TDOLWD Financial Management Handbook Provision 2, p.9</i>	Please review invoices and financial documentation
30.	Does a responsible official review costs charged to direct and indirect cost centers in accordance with applicable grant agreements and applicable federal management circulars pertaining to cost principles?	<i>TDOLWD Financial Management Handbook Provision 9 (F) p. 20</i>	Consult administrative staff/ accountant to verify the qualifications of individual designated for this responsibility
31.	If indirect cost is charged to WIA, is there an approved letter on file from the cognizant agency?	<i>TDOLWD Financial Management Handbook p.4</i>	Please request letter of approval from administrative staff
32.	Are timesheets maintained for any employees who work on more than one program?	<i>OMB, A-87; A-133 20 CFR 667.220</i>	Please review timesheets of employees assigned to more than one program, for Labor Distribution

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Questions		Reference(s)	Parameters
33.	Are the LWIA's depreciation policies or methods of computing use allowances in accordance with the standards outlined in federal circulars or LWIA regulation?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please review LWIA depreciation policies
34.	Does the LWIA system have procedures that provide reasonable assurances that consistent treatment is applied in the distribution of charges as direct or indirect costs to all programs?	<i>TDOLWD Financial Management Handbook Provision 11, p. 31</i>	Please review procedures regarding distribution of direct/ indirect charges
35.	Does the LWIA system have written personnel policies covering job descriptions, hiring procedures, promotions and dismissals?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please review LWIA's personnel policies
36.	Are wages paid at or above the federal minimum wage?	<i>29 USC Sec. 206 (A)(I)</i>	Review employee wages through consultation with accountant/ payroll administrator
37.	Does the LWIA prohibit discrimination based on race, sex or, age in its employment practices?	<i>TDOLWD Financial Management Handbook</i>	Please review Title VI policy provided by administrative staff
38.	Are requests for new personnel originated only by management personnel?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Consult management personnel regarding employee hiring policy
39.	Are employee applications for new personnel thoroughly checked?	<i>TDOLWD Financial Management Handbook Provision 4, p.12</i>	Consult management personnel regarding employee hiring policy
40.	Are written termination notices maintained on file?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Consult management personnel regarding employee termination
41.	Is access to personnel files limited?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please consult administrative staff to identify employees given access to personnel files

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Subrecipient:

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Questions		Reference(s)	Parameters
42.	Is time keeping separated from payroll preparation?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please consult administrative staff regarding these procedures
43.	Are formal attendance records used?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please review employee attendance records provided by administrative staff
44.	Are formal attendance records reviewed and authorized by supervisory personnel?	<i>TDOLWD Financial Management Handbook Provision 4, p.12</i>	Please consult supervisory personnel regarding this responsibility
45.	Are persons preparing payroll independent from other payroll duties?	<i>TDOLWD Financial Management Handbook p. 3</i>	Please consult accountant/ payroll clerks regarding assigned duties
46.	Does someone independent of payroll preparation and time keeping review and approve the final payroll?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please consult accountant/ payroll clerks regarding payroll preparation
47.	Are payroll checks machine signed?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Consult payroll clerk/ accountant/ administrative staff to confirm
48.	Are payroll checks prenumbered, blank stock controlled, used in numerical sequence and numerical sequence accounted for and reconciled to the payroll check register?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Consult payroll clerk/ accountant administrative staff responsible for payroll check register
49.	Are all voided/ spoiled checks properly destroyed?	<i>TDOLWD Financial Management Handbook Provision 4, p.12</i>	Please consult accountant/ administrative personnel

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Subrecipient: _____ Monitor: _____
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Questions		Reference(s)	Parameters
50.	Do checks contain detail of gross pay and deductions?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please consult payroll clerk, review blank check stub if possible
51.	Is a reconciliation of gross and net pay amounts shown on tax returns to total payroll on the payroll register and general ledger performed at least annually?	<i>TDOLWD Financial Management Handbook p. 3</i>	Please consult payroll clerk on procedures regarding the net and gross pay reconciliation
52.	Are unclaimed checks returned to an employee independent of the payroll function?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please consult administrative staff regarding individual responsible for unclaimed checks
53.	Are unclaimed payroll checks released only after presentation of proper identification by employee a preparation of a signed receipt?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please consult payroll clerks regarding this procedure
54.	Is a continuing record maintained of all unclaimed wages?	<i>TDOLWD Financial Management Handbook Provision 4, p.12</i>	Please confirm with payroll clerk regarding the maintenance of unclaimed wages
55.	Does a person independent of time keeping and preparing payroll checks or envelopes distribute the pay checks?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Consult administrative staff/ Payroll Clerk
56.	Is the total of W-2 wages for the year reconciled to the general ledger and payroll ledger wages paid?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please review general ledger and payroll ledger to verify wages
57.	Are deposits to the payroll bank account compared with the payroll register?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Review procedure with payroll clerk verify with payroll register

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UNIFORM ADMINISTRATION DESKTOP REVIEW Reference Sheet (cont.)**

Subrecipient: _____ Monitor: _____
Grant\Contract No: _____ Funding/Service: _____ Date of Visit _____

Questions		Reference(s)	Parameters
58.	Is the payment of wages in cash prohibited?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Review LWIA policy on payment of wages/ consult payroll clerk
59.	Is the payment of wage ever made in advance of a scheduled pay day?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Consult payroll clerk regarding payment of wage policy
60.	Are employees benefit matters monitored by individuals who are knowledgeable of the applicable legal, actuarial, and accounting requirements?	<i>TDOLWD Financial Management Handbook Provision 4, p.12</i>	Review job and educational requirements of benefits administrator
61.	Is the purchasing function segregated from receiving and shipping functions, disbursing functions and cash reciting?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please review financial procedures with accountant/ administrative
62.	Are receiving reports reviewed against purchase orders when materials and supplies are received?	<i>TDOLWD Financial Management Handbook Provision 8, p. 16</i>	Please review financial procedures with accountant/ administrative staff confirm with cross referencing receiving reports against documented inventory
63.	Does LWIA use the state's service provider registry to identify qualified providers and vendors? If not, then does the LWIA identify qualified providers and vendors?	<i>TDOLWD Financial Management Handbook Provision 4, p.12</i>	Please review procurement procedures
64.	Are all purchases competitively bid?	<i>TDOLWD Financial Management Handbook Provision 4, p.12</i>	Please review purchase orders and verify the existence of several suppliers
65.	If the LWIA has subcontracts or other cooperative agreement with service providers, do the subcontracts and cooperative agreements provide information, controls, and monitoring schedules to ensure compliance with these provisions?	<i>TDOLWD Financial Management Handbook Provision 7, p. 15</i>	Please review subcontract agreements and ensure compliance information in documented
66.	Has all equipment purchased under WIA, or under any other state or federal funded contract, been tagged; and does all of the equipment appear on a current inventory listing?	<i>TDOLWD Financial Management Handbook, Provision 14</i>	Please review equipment and confirm necessary tags, and cross reference existing equipment with current inventory list.

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WORKFORCE INVESTMENT ACT
ONE-STOP ADMINISTRATIVE DESKTOP REVIEW Questionnaire Part I**

Question		Reference(s)	Parameters
1.	<p>Does the LWIA's One Stop system have at least one physical center that provides access to all of the following:</p> <ul style="list-style-type: none"> ▪ Program Authorized under Title I of WIA ▪ Programs authorized under the Wagner Peyser Act ▪ Adult Education and Literacy ▪ Programs authorize under Title I of the Rehabilitation ▪ Welfare-to-Work Programs ▪ Programs Authorized under Title V of the Older American Act ▪ Post-secondary vocational education programs ▪ Programs authorized under Title II, Chapter 2 of the Trade Act of 1974 ▪ Local and Disabled Veterans Outreach Programs ▪ Employment and Training under the Community Services Block Grant ▪ State unemployment compensation programs 	<i>WIA sec. 121 (b)(1)(B)(i-vii)</i>	Please refer to the list of services provided by a One-Stop Center in the LWIA. The administrative office should be able to provide such a list, brochure, or literature. MOU – Verify on site
2.	Are all required partners in the One-Stop represented on the LWIB, and Have the partners entered into memorandum of understanding (MOU) with the LWIB?	<i>20 CFR 662.230 (a),(e)</i>	Please refer to local board's membership list provided by the administrative entity LWIB coordinator; cross reference E&T list with LWIB membership list
3.	Does the One-Stop provide access to special services such as the dislocated worker program?	<i>WIA sec. 134 (c)</i>	Please refer to the list of services provided by the LWIA
4.	<p>Are all the One-Stop affiliates providing three or more of the following Core services in accordance with their MOUs and the WIA regulation?</p> <ul style="list-style-type: none"> ▪ Eligibility determinations ▪ Job search and placements ▪ Labor market information ▪ Initial assessments ▪ LWIA performance outcomes ▪ Welfare to Work access ▪ Information and referral to supportive services ▪ Follow-up services 	<i>WIA sec. 121 (d)(1)-(3)</i>	Please refer to MOU on file and WIA regulations.

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ONE-STOP ADMINISTRATIVE DESKTOP REVIEW Questionnaire Part II**

Question		Reference(s)	Parameters
5.	<p>Is the designated One-Stop entity eligible to receive funds under WIA 1998, as follows:</p> <ul style="list-style-type: none"> ▪ Designated through either a competitive process or through a consensus reached by the LWIA partners. ▪ Is a public or private entity or consortium of entities, of demonstrated effectiveness? ▪ Is not an elementary or secondary school, except nontraditional public schools and area vocational schools 	<i>WIA sec. 121 (d)(1)-(3)</i>	Refer to One-Stop eligibility list and confirm provisions are being satisfied
6.	Do only merit employees provide Wagner-Peyser services?	<i>20 CFR 652.207 et .seq.</i>	Please confirm with Director of Administrative Entity
7.	<p>Does the One-Stop provide or deliver access to partner programs which deliver Intensive services as follows:</p> <ul style="list-style-type: none"> ▪ Comprehensive assessments ▪ Individual employment plans ▪ Group and individual counseling ▪ Case management ▪ Short-term, prevocational services 	<i>WIA sec. 134 (d)(B)(3)</i>	Please refer to the list of partner programs and confirm these services are offered
8.	<p>Does the One-Stop provide or deliver access to partner programs which deliver training services as follows:</p> <p>Development of Individual Training Accounts Occupational skills training On-the-Job Training Entrepreneurial training Skill Upgrading Job readiness training Adult Education/ Literacy</p>	<i>WIA sec 134 (d)(B)(4)</i>	Please refer to the list of partner programs and confirm training services are provided
9.	Does the one-stop center provide an integrated intake process?	<i>State Plan</i>	Consult operational/ intake process with One-Stop director (This should be noted as an observation not a finding in the monitoring report)
10.	Determine whether the LWIA is documenting every time a customer accesses a career center service. (beyond self-help)	<i>TEGL 28-04 TEGL 7-99</i>	Consult intake process with One-Stop Director which should be able to provide documentation supporting process description (This should be noted as an observation not a finding in the monitoring report)

F & A/RDS/PROGRAM ACCOUNTABILITY REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT-WIA
NON-DISCRIMINATION DESKTOP REVIEW

Subrecipient:

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Funding/Service: _____

Monitor: _____

Date of Visit _____

The Department of Labor and Workforce Development, State and Local Workforce Investment Boards, One-Stop Career Centers, service providers, vendors, and subrecipients must comply with the following nondiscrimination and equal opportunity laws and implementing regulations:

- Civil Rights Act of 1964
- Rehabilitation Act of 1973, Section 504
- Americans with Disabilities Act of 1990
- Title IX of the Education Amendment of 1972
- Age Discrimination Act of 1965
- Department of Justice Final Rule 2002
- WIA § 188, and
- The regulations implementing the statutory provisions

Thus, PAR reviewers need to ensure that subrecipients are in compliance with the listed nondiscrimination provisions, in accordance with *TCA § 4-4-123*, and *TCA § 4-21-901 et seq.*

QUESTION		Reference(s)	Parameters
1.	Has the LWIA appointed its equal opportunity officer for WIA Title I services?	<i>E&T Memo #00-05</i> 29 CFR 37.23-31	Verify name of staff with this responsibility, name identified on poster. Copy of letter to appointed staff.
2.	Has the LWIA provided reasonable accommodation for persons with disability? If not, see #16.	<i>20 CFR 662.200</i> <i>(b)(4)(9)</i> <i>ADA 1990 503/504</i> <i>29CFR 37.4</i>	Verify for all sites included in sample
3.	Does the LWIA provide initial and continuing notice, using the required nondiscrimination language that it does not discriminate on any prohibited ground?	<i>29 CFR 37.29-30</i>	Posters, broadcast, RFPs, closed caption, etc.
4.	Does the LWIA publish or broadcast program information in the news media, and if so, does the LWIA indicate in the publications and broadcasts: <ul style="list-style-type: none"> • That the WIA funded program or activity in question is an equal opportunity employer/program, and • That auxiliary aids and services are available upon request to individuals with disabilities. 	<i>29 CFR 34.24</i>	Review of articles, text for PSAs, or any other form of media, ie., newspaper article, examples, etc.
5.	Has the LWIA applied the 4-Factor Analysis to its programs in order to determine how best to deliver language assistance to individuals who are Limited English Proficient?	<i>Federal Register,</i> <i>May 2003, Civil</i> <i>Rights Title VI, Dept.</i> <i>of Justice – National</i> <i>Origin</i>	Written policy stating review of 4-Factor Analysis and conclusions.
6.	If the 4-Factor Analysis indicates the need for language assistance services, does the LWIA have in place one or more of the following oral interpretation services: <ul style="list-style-type: none"> • Bi-lingual staff • Staff interpreters • Contract interpreters, or • Telephone interpreter line 	<i>Federal Register,</i> <i>May 2003,</i> <i>Department of</i> <i>Justice – National</i> <i>Origin</i>	Review or process that LWIA follows. Example: “I speak..” cards.

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REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT-WIA
NON-DISCRIMINATION DESKTOP REVIEW

Subrecipient: _____

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QUESTION		Reference(s)	Parameters
7.	Do the LWIA's written translation procedures fall within the 'Safe Harbor' provisions?	<i>Federal Register, May 2003</i>	Review text or analysis, documentation of census count.
8.	Does the LWIA have policies and procedures in place which ensure that interpreters and/or interpreter services provide interpretations as follows: <ul style="list-style-type: none"> • With demonstrated proficiency and ability to interpret in both English and the other language, and the ability to identify consecutive, summary, simultaneous, or sight interpretations. • With knowledge of specialized terms and concepts of the program, and any specialized vocabulary or phrases used by the LEP person. 	<i>Federal Register, May 2003, Department of Justice – National Origin</i>	Review policies and procedures, listing of certified interpreters.
9.	Does the LWIA have policies and procedures in place which ensure the following: <ul style="list-style-type: none"> • That interpreters must certify that they will deliver interpretations that are accurate and not biased. • That interpreters shall accept payment for services only from the LWIA and never from the client. 	<i>Federal Register, May 2003, Department of Justice – National Origin</i>	Review policies and procedures, listing of certified interpreters, including payment statement.
10.	After applying the 4-Factor Analysis, and if the need for translation of vital documents is reasonable and necessary, does the LWIA provide written translations of : <ul style="list-style-type: none"> • Consent and complaint forms. • List of One-Stop partners and services offered. • Appeals documents. • Notices requiring a response from clients. • Information on the right to file complaints of discrimination. • Information on the provision of services to individuals with disabilities. • State wage and hour and safety and health information, and • Notices of free language assistance. 	<i>Federal Register, May 2003</i>	Review documents and/or posters.
11.	Does the LWIA have procedures and policies in place which ensure planning and development of: <ul style="list-style-type: none"> • Methods of identifying LEP individuals who need language assistance. • Training for staff on the available language services and how to use them. • Easily accessible and widely known notices of free language assistance. • Training staff on monitoring interpreter activity 	<i>Federal Register, May 2003</i>	Review of policies and procedures.

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REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT-WIA
NON-DISCRIMINATION DESKTOP REVIEW

Subrecipient: _____

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QUESTION		Reference(s)	Parameters
12.	Does the covered LWIA have policies, procedures, and auxiliary aids and services in place which ensure the reasonable and necessary delivery of program services to qualified handicapped individuals who have physical and/or mental impairments?	<i>Rehabilitation Act of 1973 Section 504 29 CFR 37.4 (1-4)</i>	Review of policies and procedures, all media, including videos, DVDs, etc.
13.	Does the covered LWIA have policies and procedures in place that ensure individuals with qualifying disabilities will be referred for auxiliary aids and services?	<i>29 CFR 37.9 (d)</i>	Review of policies and procedures.
14.	Does the LWIA have in place communications devices, such as TTY or TDD, or equally effective communications system, for participants with hearing impairment?	<i>29 CFR 37.9 (a)-(d)</i>	Visual confirmation for device or referral phone number.
15.	If the LWIA has determined that the provision of accommodations would fundamentally alter the delivery of program, service, or activity, then does the LWIA have a written statement which details the reasons for reaching this conclusion?	<i>29 CFR 37.9 (f)(1)-(3)</i>	Statement or policy regarding analysis or resources.
16.	Does the LWIA have clearly visible signage at the primary entrances of each inaccessible facility that refer individuals with disabilities to information about accessible facilities?	<i>29 CFR 37.9 (e)(1)</i>	Visual confirmation.
17.	Does the LWIA have the international symbol for accessibility at the primary entrances of each accessible facility?	<i>29 CFR 37.9 (e)(2)</i>	Visual confirmation.
18.	Do the LWIA's published personnel policies and procedures prohibit the actions as defined in Section 37.11 of the implementing regulations: <ul style="list-style-type: none"> Intimidation and retaliation for filing a complaint or furnishing information regarding administration of a WIA-assisted program, service, or activity. 	<i>29 CFR 37.11 (a)</i>	Review of policies and procedures for personnel.

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REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT-WIA
NON-DISCRIMINATION DESKTOP REVIEW

Subrecipient: _____

Grant/Contract No: _____ Funding/Service: _____

Monitor: _____

Date of Visit _____

Questions		Reference(s)	Parameters
19.	Does the LWIA post approved nondiscrimination and equal opportunity complaint procedures and contact information in: <ul style="list-style-type: none"> Primary entrances. Internal memoranda, hardcopy and electronic. Handbooks or manuals. Made available to each participant and included in the participant's file. Made available, in appropriate formats, to individuals with visual impairments.	29 CFR 37.31 (a)(b)	Visual confirmation.
20.	Do the LWIA's orientations and other presentations to new employees, participants, employers and the general public include a discussion of the nondiscrimination and equal opportunity provisions applicable to WIA programs?	29 CFR 37.36	Review or policies and procedures or any training information.
21.	Does the LWIA system have a complaint log which is used to record any complaints of discrimination?	29 CFR 37.37	Visual confirmation.
22.	Does the LWIA have documentation to ensure that all OJT plans, contracts and other similar agreements are non-discriminatory and contain provisions regarding non-discrimination and equal opportunity?	WIA Section 188	Review of documentation.
23.	How does the LWIA provide disability awareness training for designated staff at the one-stop center?	29 CFR 37.54 TN DOP policy 4/14/04 Advisory memorandum #3	Who, when and frequency of training.
24.	Has the contract agency received any discrimination complaints last fiscal year or during the current contract year? Explain.	WIA Section 188 29 CFR 37	Review of documents
25.	What assurances of compliance have been signed by the agency? When and by whom were they signed?		Review of documents
26.	What documentation does the agency keep as proof of its non-discriminatory status?	29 CFR 37	Review of documents and/or previous audit and corrective actions.

OFFICE OF PROGRAM ACCOUNTABILITY REVIEW
DOLWD LABOR EXCHANGE AND ADULT ELIGIBILITY SERVICES DESKTOP REVIEW
LABOR EXCHANGE ADULT ELIGIBILITY SERVICES QUESTIONNAIRE

Subrecipient:

Grant/Contract No: _____

Funding/Service: _____

Monitor: _____

Date of Visit _____

QUESTION		Reference(s)	Parameters
1.	Are core services and applicable Intensive services made available by the Career Center system to all of the following without eligibility requirements and regardless of the area of residency: <ul style="list-style-type: none"> ▪ All employers and job seekers ▪ Unemployment Insurance Claimants ▪ Veterans ▪ Migrant and seasonal farm-workers, and ▪ Individuals with disabilities 	29 U.S.C. 49b 662.240 E&T Memo 00-10	Please review policy and procedure
2.	Are there Employment Service Offices in the LWIA which are funded by WIA 1998 and not formally affiliated with the One-Stop system?	20 CFR 652.202 (a)	Compare listing of all employment services office with MOU
3.	Does the Career Center System have sufficient staff, equipment and oversight to deliver Core services and applicable Intensive services through: <ul style="list-style-type: none"> • Self Service • Facilitated self-service, and • Staff assisted service (Are the necessary resources available? Back-up resources?)	20 CFR 652.207 (b)(2)(I)- (iii)	Visual confirmation (please note as an observation.)
4.	Does the Career Center system have a documented procedure in place which ensures that staff provide UI claimants with: The opportunity for core services and applicable intensive services?	20 CFR 652.210(b)(1)-(2)	Please review policy and procedure
5.	Does the Career Center system have a documented procedure in place which ensures that staff: Receive information about UI claimants' ability or availability of work offered to them?	20 CFR 652.210 (b)(3)	Please review policy and procedure
6.	Does the Career Center system make intensive services available by the One-Stop operator, by contracts with service providers?	20 CFR 663.100 (b)(2)	Review service providers' contracts
7.	Does the Career Center system have in place policies and procedures which ensure that One-Stop operators provide: <ul style="list-style-type: none"> ▪ Coordinated resources and services for supportive Services to assist adults and dislocated workers ▪ Accurate information about the availability of supportive services in the LWIA, and ▪ Referral to activities which provide supportive services 	20 CFR 663.800 WIA sec. 134 (d)(2)(H)	Please review policy and procedure
8.	Does the LWIA system have policies and procedures in place which demonstrate that: <ul style="list-style-type: none"> ▪ Follow –up services are include in IEPs ▪ Proposed monetary assistance during and throughout follow-up services are include in IEPs ▪ Criteria used to provide support services to individuals who are employed and earning self sufficient wages 	20 CFR 663.150 (b)	Please review policy, procedure and random participant files

OFFICE OF PROGRAM ACCOUNTABILITY REVIEW
DOLWD LABOR EXCHANGE AND ADULT ELIGIBILITY SERVICES DESKTOP REVIEW
LABOR EXCHANGE ADULT ELIGIBILITY SERVICES QUESTIONNAIRE

Subrecipient:

Monitor:

Grant/Contract No: _____

Funding/Service: _____

Date of Visit _____

QUESTION		Reference(s)	Parameters
9.	Does the Career Center system have documentation that the One-Stop operator determines that: <ul style="list-style-type: none"> Participants need training services, and have the skills and qualifications to successfully complete a training program? 	20 CFR 663.310 (b)	Please review policy and procedure, i.e., core first, employment search, intensive second, employment search, and then training. (Exceptions for IWT and Skill Shortage grants.)
10.	Does the Career Center System have documentation which demonstrates that participants are determined to be eligible through state priority system?	WIA, T.A. Manual, September 2005 E&T 00-11	Please review policy and procedure
11.	In the event of limited adult program funds in the LWIA (75% expended by end of 3 rd quarter), does the Career Center system have records which show the accurate use of 'public assistance' or 'low income' adult eligibility per the HHS table of Lower Living Standard Income Levels?	20 CFR 663.600(a) WIA sec. 134 (d)(4)(E) E&T Memo 05-29	Please review policy and procedure LWIA must provide funding expenditure information
12.	Does the LWIA have policies and procedures in place which ensure that a participant in a program shall not displace other employees: <ul style="list-style-type: none"> Who are on layoff from similar jobs Whom the employer has terminated with the intention of filling the position with subsidized and/or employees Whose place for promotion is infringed upon? 	20 CFR 667.270 (c) (1)-(3)	Please review policy and procedure
13.	Does the LWIA have in place policies and procedures regarding wage and labor standards and health and safety standards that comply with WIA regulations?	20 CFR 667.272, 667.274	Please review policy and procedure
14.	If the LWIA is providing prevocational services has the LWIA: <ul style="list-style-type: none"> Developed a curriculum for computer based learning that identifies the prevocational services offered Developed a mechanism to demonstrate sufficient command of the material, and Provided a structured workspace and the ability to provide staff assistance? 	E&T Memo 02-01 Change 1 E&T Memo 02-21 Change 1	Please review policies, procedures, posters
15.	Describe the criteria developed by the LWIA to target those most in need of training services.	WIA T.A. Manual September 2005	Please review policy and procedure
16.	Does the LWIA system have documentation showing the follow-up services for a minimum of 12 months following the first day of employment, to registered participants who are placed in unsubsidized employment?	20 CFR 663.150 (b)	Please review policies, procedures, random participant files. Ex: Case notes.

OFFICE OF PROGRAM ACCOUNTABILITY REVIEW
DOLWD LABOR EXCHANGE AND ADULT ELIGIBILITY SERVICES DESKTOP REVIEW
ADULT WORKSHEET REFERENCE

Subrecipient: _____

Grant/Contract No: _____

Funding/Service: _____

Monitor: _____

Date of Visit _____

Question		Reference(s)	Parameters
1.	Date of Birth	<i>eCMATS WIA Program Manual</i> <i>TEGL 7-99</i> <i>TEGL 3-03, Chg 3</i>	Photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card
2.	If male, 18yrs & born after 1-01-60 Has he registered for Selective Service	<i>WIA sec 185 (a)(1)</i> <i>WIA sec 189 (h)</i> <i>TEGL 7-99</i>	Photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card, Selective Service website or Selective Service card
3.	Age and SS Verification	<i>eCMATS WIA Program Manual</i> <i>TEGL 3-03, Chg 3</i>	Photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card
4.	Date of WIA Application in eCMATS	<i>eCMATS WIA Program Manual</i> <i>TEGL 3-03, Chg 3</i>	Copy of eCMATS page which contains WIA application date
5.	Date of Hard Copy Application	<i>eCMATS WIA Program Manual</i> <i>TEGL 3-03, Chg 3</i>	Application signed by participant and case manager
6.	Has eligibility been verified?	<i>eCMATS WIA program Manual</i>	Photocopies of Driver's License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card
7.	Equal Employment Opportunity Statement (English/Spanish)	<i>WIA sec 185 (a)(1)</i> <i>E & T 04-27</i>	Form requires signature from participant and case manager
8.	Documentation of Core Services	<i>29 U.S.C. 49b</i> <i>20 CFR 652.202 (a)</i> <i>E&T Memo 00-01</i> <i>TEGL 7-99</i>	Documentation of all core services provided Examples in TEGL 7-99
9.	Documentation of Intensive Services need and documentation that after one core service was provided the participant was unable to obtain employment.	<i>29 U.S.C. 49b</i> <i>20 CFR 652.202 (a)</i> <i>E&T Memo 00-01</i> <i>TEGL 7-99</i>	Documentation of all intensive services and evidence that participant was unable to obtain employment after initial core service. Random participant files
10.	Has the Individual Employment Plan been developed after core services and is training linked to demand occupation?	<i>WIA T.A. Manual Sept. 2005</i>	IEP requires signature from participant and case manager. Demand occupations should be provided within Local Plan

OFFICE OF PROGRAM ACCOUNTABILITY REVIEW
DOLWD LABOR EXCHANGE AND ADULT ELIGIBILITY SERVICES DESKTOP REVIEW
Adult Worksheet Reference Page Part II

Subrecipient:

Grant/Contract No: _____

Funding/Service: _____

Monitor: _____

Date of Visit _____

Question		Reference(s)	Parameters
11.	Pell Coordination, Wilder-Naifeh Lottery Scholarship, Hope, TSAC	20 CFR. 663.320 E&T Memo 00-01 E&T Policy 04-27	Verification for educational institutional, and/or copy of financial aid application
12.	If participant has disabilities, is the LWIA considering him as a family of one?	20 CFR 663.640	Documentation showing funding amount and procedure used to determine priority
13.	Has attendance during training been properly documented?	eCMATS WIA Program Manual	Attendance records, case notes.
14.	Case Notes	eCMATS WIA Program Manual T.A. Manual September 2005 WIA 185 (a)(1)	Case manager's notes providing evidence of participant's progress throughout services
15.	Does the ITA meet the LWIA's requirement for time duration and cost limitation?	Local Board policy statement	Explanation of procedure for which funding amount was determined
16.	Does the provider of training services appear in the list of eligible training providers?	See Training Providers access button on E&T Website: www.ja.state.tn.us/thec/cbjt/PgSrchEng.jsp	Please review Training Providers list on E&T Website
17.	Can the LWIA verify the participant has not met other grant requirements before WIA funding is made available?	E&T Memo # 00-17	Verification from educational institution, and/or copy of financial aid application, documentation of other funding sources
18.	How is the satisfactory progress of the participant in training documented?	WIA sec. 185(a)(1)	Please review participant's case notes
19.	Does the participant file contain documentation of grievance and complaint procedures?	E&T Memo # 00-6	Form requires signature for participant and case manager
20.	For files that eCMATS indicate supplemental data is there is an auditable record in the file?	TEGL 7-99	Documentation of all training services, employment verification for 1 st , 2 nd and 3 rd quarters after exit

**F & A /RDS/PROGRAM ACCOUNTABILITY AND REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT – WIA YOUTH ELIGIBILITY DESKTOP REVIEW QUESTIONNAIRE**

Subrecipient:

Monitor:

Grant/Contract No: _____

Funding/Service: _____

Date of Visit _____

Question		Reference(s)	Parameters
1.	Did Youth deficient in basic literacy skills constitute at least 50 percent of total youth served?	<i>WIA T.A. Manual, September 2005; or Memo 00-07</i>	Please review Discoverer Report for in-school / out-school youth, provided by LWIA administrative office
2.	Did funds spent on youth determined not to be economically disadvantaged constitutes more than five percent (5%) of the youth enrollees, by program year?	<i>E&T Memo 00-02 20 CFR 664.220</i>	Review Discoverer report for participant count
3.	How were youth providers selected?	<i>20 CFR 652.207 (b)(2)(I)-(iii)</i>	Please review the LWIA's request for proposal process.
4.	Do out of school youth meet the following criteria: A. School drop-out or B. High School Graduate that is ▪ Deficient in basic skills ▪ Unemployed or underemployed	<i>WIA T.A. Manual, September 2005; ECMATS Program Manual/ or 20 CFR 664.300</i>	Review ECMATS/Discoverer Report/ random participant file
5.	Are 30 percent of youth funds going towards serving out-of-school population?	<i>WIA T.A. Manual, September 2005; E&T Memo 02-19/ or WIA 664.310</i>	Please review allocation expenditure records provided by LWIA accountant, cross reference with grant administrator For additional reference use ECMATS/Discoverer Report
6.	What percentage of funds is being utilized to assist youth that do not meet income criteria? Maximum allowable is 5 percent.	<i>WIA T.A. Manual, September 2005, 20 CFR 664.220</i>	Please review allocation expenditure analysis provided by LWIA accountant, cross reference with grant administrator
7.	Are all TEN required elements of Youth Program being made available in the Local Area? A. Tutoring and study skills B. Alternative school services C. Summer Employment Opportunities D. Paid and unpaid work experiences E. Occupational skills training F. Leadership development opportunities G. Support services (locally defined) H. Adult mentoring I. Comprehensive guidance and counseling J. Follow- up	<i>WIA T.A. Manual, September 2005, 20 CFR 664.410</i>	Please review LWIA's current plan, Reference literature and documentation provided by administrative office detailing the required services that are available in the LWIA, provide listing of sub-contractors that are providing these elements

**F & A /RDS/PROGRAM ACCOUNTABILITY AND REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT – WIA YOUTH ELIGIBILITY DESKTOP REVIEW QUESTIONNAIRE**

Subrecipient:

Monitor:

Grant/Contract No: _____

Funding/Service: _____

Date of Visit _____

	QUESTION	Reference(s)	Parameters
8.	Is the Youth Council meeting regularly? A. Is membership attending meetings? B. Is there a quorum when contracts are approved and Request for Proposals (RFPs) are issued?	20 CFR 663.310(A)	Review Youth Council minutes
9.	If the LWIA has youth participants with ITAs (Individual Training Accounts), are the participants: ▪ Age 18 and above ▪ Dually enrolled in the adult program or the dislocated worker program? <i>Currently Tennessee has a waiver to issue ITA's in the Youth Program</i>	20 CFR 664.510	Refer to ECMATS/ Discoverer Report
10.	Does the LWIA system provide youth referrals for supportive services?	WIA sec. 129 (2)(G)	Refer to ECMATS/ Discoverer Report
11.	Does the LWIA system provide objective assessments for youth participants and work experiences for youth such as: ▪ Instruction in employability skills ▪ Exposure to the aspects of industry such as team work, internship, paid and unpaid community service, or job shadowing?	20 CFR 664.460	Refer to ECMATS/ Discoverer Report
12.	Does the LWIA system include Youth Program components which include leadership, development opportunities, such as: ▪ Exposure to post-secondary education opportunities ▪ Community and service learning projects ▪ Peer-centered activities ▪ Team leadership training ▪ Training in decision-making ▪ Citizenship training	WIA sec. 129.(c)(2)(F) 20 CFR 664.420)	Refer to Participant Files for documentation (case notes) – review completion certificates if available

**F & A /RDS/PROGRAM ACCOUNTABILITY AND REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT – WIA YOUTH ELIGIBILITY DESKTOP REVIEW QUESTIONNAIRE
YOUTH WORKSHEET REFERENCE**

Subrecipient:

Grant/Contract No: _____

Funding/Service: _____

Monitor:

Date of Visit _____

Question		Reference(s)	Parameters
1.	Date of Birth	<i>eCMATS WIA Program Manual TEGL 7-99</i>	Photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card
2.	If male, 18yrs & born after 1-01-60 Has he registered for Selective Service	<i>WIA sec 185 (a)(5) WIA sec 189 TEGL 7-99</i>	Photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card, Selective Service website or Selective Service card
3.	Age and SS Verification	<i>eCMATS WIA Program Manual TEGL 7-99</i>	Photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card
4.	Date of WIA Application in eCMATS	<i>eCMATS WIA Program Manual</i>	Copy of eCMATS page which contains WIA application date
5.	Date of Hard Copy Application	<i>eCMATS WIA Program Manual</i>	Application signed by participant and case manager
6.	Has eligibility been verified?	<i>eCMATS WIA program Manual 2002</i>	Photocopies of Driver's License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card/Income verification
7.	Equal Employment Opportunity Statement (English/Spanish)	<i>WIA sec 185 (a)(5) E & T Policy 04-27</i>	Form requires signature from participant and case manager
8.	Documentation of Core Services	<i>29 U.S.C. 49b 20 CFR 652.202 (a) E&T Memo 00-01</i>	Documentation of all core services provided
9.	Documentation of Intensive Services need and documentation that after one core service was provided the participant was unable to obtain employment.	<i>29 U.S.C. 49b 20 CFR 652.202 (a) E&T Memo 00-01</i>	Documentation of all training services and evidence that participant was unable to obtain employment after initial core service.
10.	Has Individual Service Strategies been developed after core services and is training linked to demand occupation?	<i>WIA T.A. Manual Sept. 2002</i>	IEP requires signature from participant and case manager. Demand occupations should be provided within Local Plan

**F & A /RDS/PROGRAM ACCOUNTABILITY AND REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT – WIA YOUTH ELIGIBILITY DESKTOP REVIEW QUESTIONNAIRE
YOUTH WORKSHEET REFERENCE**

Subrecipient: _____ Monitor: _____
Grant/Contract No: _____ Funding/Service: _____ Date of Visit _____

Question		Reference(s)	Parameters
11.	Pell Coordination, Wilder-Naifeh, Hope, TSAC	<i>20 CFR. 663.320</i>	Verification for educational institutional, and/or copy of financial aid application
12.	If participant has disabilities, is the LWIA considering him as a family of one?	<i>20 CFR 664.250 TEGL 3-03 Change 3</i>	Documentation of disability
13.	Has attendance during training been properly documented?	<i>eCMATS WIA Program Manual</i>	Attendance Records/case notes
14.	Case Notes	<i>eCMATS WIA Program Manual WIA 185 (a)(1)</i>	Case manager's notes providing evidence of participant's progress throughout services
15.	Does the ITA meet the LWIA's requirement for time duration and cost limitation?	<i>Local Board policy statement</i>	Please review policy and procedure; request explanation of procedure for which funding amount was determined
16.	Does the provider of training services appear in the list of eligible training providers or contracted RFP process?	<i>See Training Providers access button on E&T Website: www.ja.state.tn.us/thec/cbjt/PgSrchEng.jsp</i>	Please review Training Providers list on E&T Website or youth provider list
17.	Can the LWIA verify the participant has not met other grant requirements before WIA funding is made available?	<i>E&T Memo # 01-17</i>	Verification from educational institution, and/or copy of financial aid application, documentation of other funding sources (Pell, Wilder-Naifeh, Hope, TSAC)
18.	How is the satisfactory progress of the participant in training documented?	<i>WIA sec. 185(a)(1)</i>	Please review participant's case notes
19.	Does the participant file contain documentation of grievance and complaint procedures?	<i>E&T Memo # 00-6</i>	Form requires signature for participant and case manager
20.	For files that eCMATS indicate supplemental data is there is an auditable record in the file?	<i>TEGL 7-99</i>	Documentation of all training services, employment verification for 1 st , 2 nd and 3 rd quarters after exit

**OFFICE OF PROGRAM ACCOUNTABILITY REVIEW
DOLWD LABOR EXCHANGE AND ADULT ELIGIBILITY SERVICES DESKTOP REVIEW
DISLOCATED WORKER WORKSHEET REFERENCE**

Subrecipient:

Monitor:

Grant/Contract No:

Funding/Service:

Date of Visit

Question		Reference(s)	Parameter
1.	Date of Birth	<i>eCMATS WIA Program Manual TEGL 7-99</i>	Photocopies of Driver's License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card
2.	If male, 18yrs & born after 1-01-60 Has he registered for Selective Service	<i>WIA sec 185 (a)(5) WIA sec 189 TEGL 7-99</i>	Photocopies of Driver's License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card, Selective Service website or Selective Service card
3.	Age and SS Verification	<i>eCMATS WIA Program Manual TEGL 7-99</i>	Photocopies of Driver's License, Social Security Card, State ID, Birth Certificate, U.S. Passport, Permanent/ Alien Resident Card
4.	Date of WIA Application in eCMATS	<i>eCMATS WIA Program Manual</i>	Copy of eCMATS page which contains WIA application date
5.	Date of Hard Copy Application	<i>eCMATS WIA Program Manual</i>	Application signed by participant and case manager
6.	Has eligibility been verified? <u>Dislocated A,B,C,D (documentation of):</u> a. Terminated or laid off, received notice of pending termination, is eligible or has exhausted Unemployment Compensation, demonstrated attachment to the workforce, but not eligible for UI due to insufficient earnings or employer not being covered, or b. Terminated or layoff due to permanent plant closure, facility has made announcement of closure in 180 days, or c. Once self-employed but unemployed due to economic conditions or disaster, or d. Displaced Homemaker	<i>eCMATS WIA program Manual TEGL 3-03, Chg3</i>	Separation Notice, UI records, Public Announcement of layoff, etc.
7.	Equal Employment Opportunity Statement (English/Spanish)	<i>WIA sec 185 (a)(5)</i>	Form requires signature from participant and case manager
8.	Documentation of Core Services	<i>29 U.S.C. 49b 20 CFR 652.202 (a) E&T Memo 00-01</i>	Documentation of all core services provided (Examples in TEGL 7-99)
9.	Documentation of Intensive Services need and documentation that after one core service was provided the participant was unable to obtain employment.	<i>29 U.S.C. 49b 20 CFR 652.202 (a) E&T Memo 00-01</i>	Documentation of all intensive services and evidence that participant was unable to obtain employment after initial core service.
10.	Has Individual Employment Plans been developed after core services and is training linked to demand occupation?	<i>WIA T.A. Manual Sept. 2005</i>	IEP requires signature from participant and case manager. Demand occupations should be provided within Local Plan

**OFFICE OF PROGRAM ACCOUNTABILITY REVIEW
DOLWD LABOR EXCHANGE AND ADULT ELIGIBILITY SERVICES DESKTOP REVIEW
DISLOCATED WORKER WORKSHEET REFERENCE**

Subrecipient:

Monitor:

Grant/Contract No: _____

Funding/Service: _____

Date of Visit _____

Question		Reference(s)	Parameter
11.	Pell Coordination, Wilder- Naifeh, Hope, TSAC	20 CFR. 663.320 E&T Policy 04-27	Verification for educational institutional, and/or copy of financial aid application
12.	If participant has disabilities, is the LWIA considering him as a family of one?	20 CFR 663.640	Documentation showing funding amount and procedure used to determine amount
13.	Has attendance during training been properly documented?	eCMATS WIA Program Manual	Attendance Records
14.	Case Notes	eCMATS WIA Program Manual TA Manual, September 2005	Case manager's notes providing evidence of participant's progress throughout services
15.	Does the ITA meet the LWIA's requirement for time duration and cost limitation?	Local Board policy statement	Explanation of procedure for which funding amount was determined
16.	Does the provider of training services appear in the list of eligible training providers?	See Statewide Training Providers list: www.ja.state.tn.us/thec/cbjt/PgSrchEng.jsp	Please review Training Providers list on E&T Website
17.	Can the LWIA verify the participant has not met other grant requirements before WIA funding is made available?	E&T Memo # 00-17	Verification from educational institution, and/or copy of financial aid application, documentation of other funding sources
18.	How is the satisfactory progress of the participant in training documented?	WIA sec. 185(a)(1)	Please review participant's case notes
19.	Does the participant file contain documentation of grievance and complaint procedures?	E&T Memo # 00-6	Form requires signature for participant and case manager
20.	For files that eCMATS indicate supplemental data is there is an auditable record in the file?	TEGL 7-99	Documentation of all training services, employment verification for 1 st , 2 nd and 3 rd quarters after exit

**OFFICE OF PROGRAM ACCOUNTABILITY REVIEW
DOLWD LABOR EXCHANGE AND ADULT ELIGIBILITY SERVICES DESKTOP REVIEW
DISLOCATED WORKER QUESTIONNAIRE**

Subrecipient: _____

Monitor: _____

Grant\Contract No: _____

Funding/Service: _____

Date of Visit _____

Question		Reference	Parameter
1.	Has the LWIA developed a policy for relocation assistance and the rationale for the policy?	<i>E&T Memo 00-03</i>	Please review policy and procedure
2.	Has the LWIA provided relocation assistance to any dislocated worker? If yes, is there a record documenting that the worker is receiving or will receive 75% of his previous wage in the new location of employment?	<i>E&T Memo 00-03,</i>	Please review relocation assistance documentation
3.	Has the LWIA followed state procedure for integrating WIA Title I funds and Pell Grant for dislocated workers who need classroom training activities?	<i>E&T Memo 00-17</i>	Please review policy and procedure
4.	Has the LWIA provided information to new businesses in the area that want to provide OJT training to dislocated workers who need OJT?	<i>E&T Memo 01-18</i>	Please review literature and feedback correspondence if available

**F & A/RDS/PROGRAM ACCOUNTABILITY REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT – WIA**

NEG & TAA/NAFTA DESKTOP REVIEW GUIDE REFERENCE SHEET

Subrecipient: _____ Monitor: _____
Grant/Contract No: _____ Funding/Service: _____ Date of Visit: _____

QUESTION		Reference(s)	Parameters
1.	Is the LWIA making progress integrating services provided by TAA/NAFTA?	<i>E&T Memo, 00-04 E&T Memo, 00-12</i>	Please review local plan, observe procedural process
2.	What is the procedure at the local level to respond to plant closures and mass layoffs?	<i>20 CFR 671.160 State Plan</i>	Please review local plan, and review documented procedural process
3.	Is the local rapid response coordinator submitting information on the rapid response activities in the area to the Employment and Training section of the TDOLWD?	<i>E&T Memo, 00-15</i>	Please review records of rapid response activities; discuss with rapid response coordinator if available
4.	Are needs surveys distributed and collected before mass meetings?	<i>E&T Memo 01-15</i>	Please review surveys and discuss with local administrator/ rapid response coordinator
5.	Does the local rapid response system include in its response activities: <ul style="list-style-type: none"> ▪ Immediate and on-site contact with the employer, Workers, and the local community ▪ Provision of information and access to Unemployment compensation benefits, One-Stop system services, and employment and training activities ▪ Guidance or financial assistance setting up a labor Management committee, or a committee, and ▪ Provision of assistance to the local board to develop a coordinated response. 	<i>20 CFR 665.310 (a)-(d)</i>	Please discuss and review procedural process with local administrator/ rapid response coordinator
6.	Does the contractor have policies and procedures in place to ensure that individuals who apply for NEG services meet the following eligibility guidelines? <ul style="list-style-type: none"> ▪ A dislocated worker ▪ A civilian employee of the Department of Defense ▪ Long-term unemployed as a result of disaster ▪ A non-managerial employee with the Department of Defense ▪ A member of armed forces at risk of termination due to reduction in defense expenditures ▪ Not entitled to retired or retained pay incident to a separation ▪ Has applied for employment and training assistance before the end of the 180 day period 	<i>WIA sec 173 (c)(2)(A)(i-iv) WIA sec 173 (d)(2)</i>	Please review policy and procedures

**F & A/RDS/PROGRAM ACCOUNTABILITY REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT – WIA**

NEG & TAA/NAFTA DESKTOP REVIEW GUIDE REFERENCE SHEET

Subrecipient: _____ Monitor: _____
Grant/Contract No: _____ Funding/Service: _____ Date of Visit _____

QUESTION		Reference(s)	Parameters
7.	Is the targeted population reached; underemployed, because of their lack of certification, or unemployed, but expect to become employed, as a result of their participation in the program?	<i>E&T Memo, 00-12</i>	Please review local report; and consult with local administrator
8.	Does the LWIA system have documentation in place which demonstrates integration of services funded under TAA/NAFTA, with services funded under WIA Title I / Wagner-Peyser, as follows: <ul style="list-style-type: none"> ▪ Eligibility determinations ▪ Reemployment plans ▪ Job search allowance applications ▪ Relocation allowance applications ▪ Case Management, and ▪ Training waiver options 	<i>E&T Guidance Letter 5-00; E&T Memo 00-12</i>	Please review documentation that demonstrates integration of services; Observe procedural methods used in the LWIA system

**F & A/RDS/PROGRAM ACCOUNTABILITY AND REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT
WORKFORCE INVESTMENT ACT
National Reserve Grant Desktop Review Guide**

Question		Reference(s)	Parameters
1.	Do the military workers under this grant meet the eligibility criteria for dislocated workers?	<i>WIA 101(9)</i>	Please review eligibility of participants through random file review
2.	Has the contractor documented that the person served is the spouse of military personnel?	<i>Current Contract w/USDOL</i>	Please review documentation to verify with local administrative office
3.	Has the contractor met the expenditure goals for serving dislocated workers?	<i>Current Contract w/USDOL</i>	Please review contract documentation
4.	If the quarterly expenditure or program goals have not been met, has the contractor provided an explanation in writing to the state in the quarterly report?	<i>Current Contract</i>	Please review documentation with explanation; and quarterly report
5.	Has the contractor submitted quarterly reports on a timely basis?	<i>Current Contract</i>	Please review submittal dates of report - October 15, January 15, April 15, and July 15

**F & A/RDS/PROGRAM ACCOUNTABILITY REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT – WIA**

STATEWIDE AND INCENTIVE GRANT DESKTOP REVIEW GUIDE REFERENCE SHEET

Subrecipient:

Monitor:

Grant/Contract No: _____

Funding/Service: _____

Date of Visit _____

	QUESTION	Reference(s)	Parameters
1.	<u>JTG</u> Has the Department accounted for 50% of the JTG Eligible youth to be also WIA eligible?	<i>Current Contract</i>	Please review contract documentation
2.	Does the JTG program have records which demonstrate the program's focus on: <ul style="list-style-type: none"> ▪ Career Development ▪ Job attainment ▪ Job survival ▪ Basic skills ▪ Leadership skills ▪ Self-development skills ▪ Personal skills 	<i>JTG Program Handbook</i> <i>Current Contract</i>	Please review contract documentation
3.	Are all ten required elements of the JTG program being made available in the local area? <ul style="list-style-type: none"> ▪ Tutoring and study skills ▪ Alternative schools services ▪ Summer Employment Opportunities ▪ Paid and unpaid work experiences ▪ Occupational skills training ▪ Leadership development opportunities ▪ Support services (locally defined) ▪ Adult mentoring ▪ Comprehensive guidance and counseling ▪ Follow-up 	<i>20 CFR 664.410</i> <i>WIA T.A. Manual, September 2005</i>	Please review procedure and policy; observe procedural method applied
4.	<u>AFL-CIO</u> Has the contractor provided regular reporting requirements of all Rapid Response activities?	<i>20 CFR 665.310 (a)-(d)</i>	Review documentation of Rapid Response activities
5.	Has the contractor met the expenditure quarterly goals to ensure the 80% of contract will be expended?	<i>State Plan</i>	Please review contract parameters
6.	Has the contractor provided reports on training and technical assistance provided to organized labor groups?	<i>E&T Policy 01-15 State Plan</i>	Please review documentation of training and technical assistance reports
7.	Does the contractor have a corrective action plan if actual expenditures reflect a variation of 15% or more above the planned expenditures?	<i>State Plan</i>	Please review contract; request corrective action plan if necessary

**F & A/RDS/PROGRAM ACCOUNTABILITY REVIEW
REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT – WIA
STATEWIDE AND INCENTIVE GRANT DESKTOP REVIEW GUIDE REFERENCE SHEET**

Subrecipient: _____ Monitor: _____
Grant/Contract No: _____ Funding/Service: _____ Date of Visit _____

	QUESTION	Reference(s)	Parameters
8.	<u>THEC</u> What is the process for conducting state level appeals determining whether or not a denied provider is eligible to participate on the State Provider's list?	<i>20 CFR 663.565 20 CFR 667.640</i>	Review documentation of process
9.	Have there been any appeals regarding denial of training provider's subsequent eligibility? If so, was the appropriate LWIB notified in writing the reasons for rejection as well as the availability of the appeals process?	<i>20 CFR 663.565) 20 CFR 667.640</i>	Review documentation of process
10.	What is the process for conducting state level appeals submitted by students participating with Eligible Training Providers, including reviewing and /or hearing parties involved in unresolved complaints?	<i>20 CFR 667.600 20 CFR 663.565 (A)(4) 20 CFR 667.640</i>	Review documentation of appeal process
11.	What, if any, on- site reviews have been performed to inspect and investigate any institutions holding a certification for participation?	<i>Subrecipient Monitoring Guide</i>	Review reports from on-site monitoring; and documentation of any inspections or investigations
12.	Has the contractor provided quarterly reports to local boards and the state regarding performance data on WIA eligible student enrollment, completion and placement rates?	<i>Current Contract</i>	Review contract documentation; and performance data
13.	Has the contractor provided local boards and state information pertaining to school closures under any condition?	<i>Current Contract</i>	Please review information provided by contractor
14.	What evidence is there that training providers have submitted renewal reports to the Tennessee Higher Education Commission with any change of status (change of address, name, tuition and fees, etc.)	<i>Current Contract</i>	Please review renewal reports

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REVIEW GUIDE FOR THE TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
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	QUESTION	Reference(s)	Parameters
15.	Does THEC website provide up-to-date information on training providers regarding performance data and program opportunities in each respective local area?	<i>State Plan, TA Manual, September 2005</i>	Please review website and training provider information
	Alliance for Business and Training, LWIA 1 Radiologic Technologists Program		
16.	Does the targeted population for this grant include employed workers and new hires in the health care industries located in LWIA 1?	<i>State Plan</i>	Review Local Plan available on-site
17.	Of those individuals placed in employment, do the wage increases reflect a 60% increase?	<i>State Plan</i>	Review Local Plan available on -site
18.	Has the contractor submitted quarterly reports on a timely basis?	<i>State Plan, Subrecipient Monitoring Guide</i>	Review quarterly reports
19.	Is the LWIA collecting statewide information on eligible individuals in the eCMATS systems?	<i>State Plan, TA Manual, September 2005,</i>	Review policy and procedure
	Workforce Essentials LWIA 8 Teacher Certification Program		
20.	Does the targeted population include those currently teaching in the public schools of LWIA 8, or those whom the school systems wish and intend to employ, but who have not yet completed their teacher certification?	<i>State Plan</i>	Review Local Plan available on-site
21.	Does the targeted population reach those who are underemployed, because of their lack of certification, or unemployed, but expect to become employed, as a result of their participation in the program?	<i>State Plan</i>	Review Local Plan available on-site
22.	Has the contractor submitted quarterly reports on a timely basis?	<i>State Plan, Subrecipient Monitoring Guide</i>	Review quarterly reports
23.	Is the LWIA collecting statewide information on eligible individuals in the eCMATS system?	<i>State Plan, TA Manual, September 2005</i>	Review policy and procedure

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	QUESTION	Reference(s)	Parameters
	<u>Incentive Grants</u>		
24.	If providing participant services, has the LWIA met the eligibility requirements of the target group to be served through the incentive grant?	<i>State Plan</i>	Review Local Incentive Plan available on-site
25.	Are quarterly reports submitted in a timely manner?	<i>E&T Policy, 02-23</i>	Please confirm that the quarterly reports are submitted on October 15, January 15, April 15, July 15
26.	If the quarterly expenditure of program goals have not been met, then has the contractor provided an explanation in writing to the state in the quarterly report?	<i>E&T Policy, 02-23</i>	Review incentive grant contract local area program documentation
27.	Is the information regarding participant eligibility and services accurately keyed into eCMATS in a timely manner?	<i>WIA T.A. Manual September 2005 ECMATS Program Manual</i>	Review policy and procedure

2. FUNDING

State Level Distribution

The Workforce Investment Act authorizes three funding streams for the WIA Title I programs- Adult, Youth, and Dislocated Workers. Eighty five (**85**) percent of the adult and youth funds and **65** percent of the dislocated worker funds are allocated to the LWIAs. Of the remaining youth, adult and dislocated worker funds, **10** percent is set-aside (State/National Reserve Funds) for statewide youth, adult and dislocated worker activities.

Five (**5**) percent is used by states to administer the programs. Additionally, **25** percent of the dislocated worker funds are used for Rapid Response activities statewide.

85 % Adults & Youth	65% Dislocated Worker
10 % State	10% State
<u>5% State Administration</u>	20% Rapid Response
	<u>5% Administration</u>
100 %	100 %

Local Level

Of the **85** percent that is used for adults and youth that is distributed to the LWIAs, 10 percent is allowed to be used for Administrative purposes and the remaining 90 percent is to be used for WIA program activities such as core, intensive, and training

Of the **65** percent that is used for the dislocated workers, **10** percent of the **65** percent is to be used for Administrative purposes. The remaining 90 percent of the 65 percent should be used for core, intensive, and training.

Grants for Adults Must Serve

All adults 18 and over are eligible to receive WIA services. In the event adult program funds allocated to an area are limited, priority will be given to recipients of public assistance and other low-income individuals. The services to be provided are 1) Core services, 2) Intensive services, and 3) Training or Retraining services.

The question “who is eligible for training” is dependent on the following conditions:

The individual employment plan developed for the customer after providing core services and intensive services

The funding availability in the area

The criteria developed by the LWIA to target the most in need for retraining services

*Note: Limited funding in an LWIA is defined as 75% expenditure rate before the end of the third quarter of that program year; at which time, the most in need or economically disadvantaged will be given priority for WIA services. *E&T Memo 05-29*

Grants for Dislocated Workers Must Serve

WIA § 101 (9) defines dislocated workers as:

- A. Individuals who have been terminated or laid off, or who have received a notice of termination or layoff from employment; are eligible for or have exhausted entitlement to unemployment compensation; have been employed for a duration sufficient to demonstrate attachment to the workforce but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that was not covered under the state unemployment compensation law; and are unlikely to return to a previous industry or occupation.
- B. An individual who has been terminated or laid off, or has received a notice of termination or layoff from employment as a result of any permanent closure of, or any substantial layoff at a plant, facility, or enterprise; is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or for purposes of eligibility to receive services other than training services described in section 134 (d) (4), intensive services described in section 134 (d)(3), or supportive services; is employed at a facility at which the employer has made a general announcement that the facility will close.
- C. An individual who was self-employed (including employment as a farmer, a rancher, or fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disaster.
- D. A displaced homemaker

Grants for Youth Must Serve

Eligible Youth

Individuals must meet the following criteria:

- Youth age 14-21
- Economically disadvantaged (Up to 5 percent of the funds allocated to a local Workforce area may be used for youth that do not meet the income criterion.)

And meet at least one of the following criteria

- Deficient in basic literacy skills
- School dropout
- Homeless, a runaway, or a foster child
- Pregnant or a parent
- Offender
- Requires additional assistance to complete an education program or to secure employment (as defined in the LWIA's plan)

Out-of-School Youth

- An out-of-school youth is an eligible youth
- Youth age 14-21
- Economically disadvantaged (Up to 5 percent of the funds allocated to a local workforce area may be used for youth that do not meet the income criterion.)

And is one of the following:

- A school dropout, or
- A high school graduate or holder of a GED but is one of the following:
- Basic skills deficient
- Unemployed, or
- Under-employed.

Priority:

Tennessee's broad strategic goals for its youth are to establish as first priority the attainment of educational skills. This goal, as delineated in Tennessee's five-year Plan, encompasses the attainment of credits required for a high school diploma for any eligible youth and/or the attainment of credits toward an equivalency for out-of-school youth. To this end Tennessee is designating eligible youth, that are deficient in basic literacy skills, as a priority for all WIA funded youth programs. Youth determined to be deficient in basic literacy skills must constitute at least 50% of the total youth served by the LWIA.

Discretionary /State & National Reserve

An LWIA may request additional funds (State Reserve Funds and National Reserve Funds) to serve WIA Title I eligible customers, who have been terminated or laid off, or have received a notice of termination or layoff from an employer. When such a request for additional funds is made, the Administrative Entity must submit a letter to the Administrator of Employment and Workforce Development.

The letter includes the number of persons to be served; the funding source (youth, adult, or dislocated worker); the training to be provided; and the amount of funds needed to serve the customers requesting services.

In addition, the document must include:

A short summary describing the circumstances for requesting funds, including the amount of available funds in the particular funding source; the total cost of training and the cost per participant; the previous occupations of the customers, and the new training field customers are seeking; analysis of the needs survey if the request is a result of plant closure or mass layoff; the reasons for not using other funding sources to pay for the training costs (Pell Grants etc.); and evidence of coordinated efforts with other partners to meet the other needs of the customers requesting training services.

The decision for approval or denial of State funding will be made within seven working days of the receipt of application. If the State denies the request for funding, the State will forward the LWIA a National Reserve Grant application. (See WIA Policy E&T Memo 01-13)

Incentive Awards

The Workforce Investment Act allows states the option of providing incentive awards for LWIAs meeting or exceeding performance goals. During the first two years, there were no incentive awards. However, a new state policy recently approved by the State Workforce Development Board on September 27, 2002, authorizes incentives and sanctions. (See Employment and Training website at www.state.tn.us/labor-wfd/et.html) For state fiscal year 2004 – 2005, incentive grants have been awarded in Tennessee, and thus must be monitored on a yearly basis.

SUMMARY STATEMENT

The success and failure of our WIA Title I program depend a great deal on how the State of Tennessee monitors this program. The monitoring process ensures the integrity of program delivery and guarantees funds are utilized consistent with the goals of the state. It also ensures programs and funds are administered according to federal rules and regulations. Through the monitoring process, shortcomings in program delivery and fiscal accountability can be detected, corrected, and improvements can be made. Therefore, it is the intent of the Tennessee Department of Labor and Workforce Development to ensure that all WIA Title I programs administered within the 13 Local Workforce Investment Areas by the Administrative Entities in conjunction with their local boards and chief elected officials are monitored on an annual basis. The department also wants to make sure WIA services, built on a foundation of good customer service, integrity, and accountability are delivered to eligible applicants and employers in a timely fashion.

Table for State Performance Indicators and Goals

WIA Performance Measures WIA § 136(b)	Performance Goals Out-Years	
	PY 2006	PY 2007
ADULTS		
Entered Employment Rate	83.0%	TBD
6-Months Retention Rate	85.0%	TBD
Average Earnings	\$13,800.00	TBD
Credential and Employment Rate	75.0%	TBD
DISLOCATED WORKERS		
Entered Employment Rate	86.0%	TBD
6-Months Retention Rate	92.5%	TBD
Average Earnings	\$16,000.00	TBD
Credential and Employment Rate	75.0%	TBD
YOUTH AGES 19-21		
Entered Employment Rate	72.0%	TBD
6-Months Retention Rate	83.5%	TBD
6-Months Earnings Change	\$3,100	TBD
Credential Rate	56.0%	TBD
YOUTH AGES 14-18		
Skill Attainment Rate	88.0%	TBD
Diploma/Equivalent Attainment Rate	67.0%	TBD
6-Months Retention in Post-Secondary Education/Training, or Placement in Military, Employment, Apprenticeship	64.0%	TBD
CUSTOMER SATISFACTION		
Participant	81.0%	TBD
Employer	80.0%	TBD

Nondiscrimination

The Department of Labor and Workforce Development, State and Local Workforce Investment Boards, One-Stop Career Centers, Service Providers, Vendors, and Sub recipients must comply with the following non-discrimination and equal opportunity laws and implementing regulations:

- Civil Rights Act of 1866 (42 U.S.C. §§1981, 1983)
- Civil Rights Act of 1964 (42 U.S.C. §2003-2)
- Age Discrimination in Employment Act of 1967 (29 U.S.C. §623)
- Pregnancy Discrimination in Employment Act (42 U.S.C. §2000e(k))
- Rehabilitation Act of 1973, Section 504 (29 U.S.C. §794)
- Americans with Disabilities Act of 1990 (42 U.S.C. §12112)
- Title IX of the Education Amendment of 1972
- Uniformed Services Employment and Reemployment Act of 1994 (38 U.S.C. §4311(a))
- Guide to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, U.S. Department of Justice, April 2002.
- Tennessee Human Rights Act (T.C.A. §4-21-401)
- WIA §188, and
- The regulations implementing the statutory provisions

Thus, PAR reviewers need to ensure that sub recipients are in compliance with the listed non-discrimination provisions, in accordance with *TCA § 4-4-123*, and *TCA § 4-21-901 et seq.*, which are in place to ensure that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. (*United States Code*, § 2000d)

and that:

No person in the United States shall, on the basis of sex, be excluded from Participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance . . . (*United States Code*, § 1681)

and

No person in the United States shall, on the ground of blindness or severely impaired vision, be denied admission in any course of study by a recipient of Federal financial assistance for any education program or activity, but nothing herein shall be construed to require any such institution to provide any special services to such person because of his blindness or visual

impairment. (*United States Code*, § 1684)

These laws and regulations are applicable to all of the programs, activities, and operations of the Department of Labor and Workforce Development and the sub recipient entities with which the department contracts utilizing federal funds. WIA 1998 describes these requirements as follows:

NON-DISCRIMINATION. (a) In General.-- (1) Federal financial assistance.--For the purpose of applying the prohibitions against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.), on the basis of disability under section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), on the basis of sex under title IX of the Education Amendments of 1972 (20 U.S.C. 1681 et seq.), or on the basis of race, color, or national origin under title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.), programs and activities funded or otherwise financially assisted in whole or in part under this Act are considered to be programs and activities receiving Federal financial assistance. (2) Prohibition of discrimination regarding participation, benefits, and employment.--No individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with, any such program or activity because of race, color, religion, sex (except as otherwise permitted under title IX of the Education Amendments of 1972), national origin, age, disability, or political affiliation or belief. (3) Prohibition on assistance for facilities for sectarian instruction or religious worship.--Participants shall not be employed under this title to carry out the construction, operation, or maintenance of any part of any facility that is used or to be used for sectarian instruction or as a place for religious worship (except with respect to the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship, in a case in which the organization operating the facility is part of a program or activity providing services to participants). (4) Prohibition on discrimination on basis of participant status.--No person may discriminate against an individual who is a participant in a program or activity that receives funds under this title, with respect to the terms and conditions affecting, or rights provided to, the individual, solely because of the status of the individual as a participant. (5) Prohibition on discrimination against certain non-citizens.--Participation in programs and activities or receiving funds under this title shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States. (*WIA § 188*)

Nondiscrimination Information and Reporting Requirements

The documentation and other compliance measures required in order to comply with nondiscrimination statutes and regulations include, and all individuals covered by these regulations must sign, a nondiscrimination provision to indicate that the provider has explained the nondiscrimination provisions. A hardcopy of the signature page must be kept in the individual's file:

- Sub recipients must provide initial and continuing notice that it does not discriminate on any prohibited ground. This notice must be provided to: (1) Registrants, applicants, and eligible applicants/registrants; (2) Participants; (3) Applicants for employment and employees; (4) Unions or professional organizations that hold collective bargaining or professional agreements with the recipient; (5) Sub recipients that receive WIA Title I funds from the recipient; and (6) Members of the public, including those with impaired vision or hearing. (b) As provided in Sec. 37.9, the recipient must take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others. All notices must contain the specific language indicated below.

Equal Opportunity Is the Law

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases against any individual in the United States: on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and against any beneficiary of programs financially assisted under Title I of the Workforce Investment Act of 1998 (WIA), on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any WIA Title I-financially assisted program or activity. The recipient must not discriminate in any of the following areas: deciding who will be admitted, or have access, to any WIA Title I- financially assisted program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; or making employment decisions in the administration of, or in connection with, such a program or activity.

29 CFR 37.29

- Sub recipients that publish or broadcast program information in the news media must ensure that such publications and broadcasts state that the WIA Title I-financially assisted program or activity in question is an equal opportunity employer/program (or otherwise indicate that discrimination in the WIA Title I-financially assisted program or activity is prohibited by Federal law), and indicate that auxiliary aids and services are available upon request to individuals with disabilities. ***29 CFR 34.24***
- Certain sub recipients are required to provide language assistance to individuals who do not speak English as their primary language and who have a limited ability to speak, read, write or understand English. These individuals are to be considered Limited English Proficient (LEP) and entitled to free language assistance. Sub recipients can begin to comply with these provisions through application of the 4-Factor Test as described in policy guidance issued by the US Department of Justice dated April 12, 2002.
(Federal Register: May, 2003. Department of Labor, Policy Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons)
- Each sub recipient must maintain, and submit upon request, a log of complaints filed with it that allege discrimination on the ground(s) of race, color, religion, sex,

national origin, age, disability, political affiliation or belief, citizenship, and/or participation in a WIA Title I-financially assisted program or activity. The log must include: the name and address of the complainant; the ground of the complaint; a description of the complaint; the date the complaint was filed; the disposition and date of disposition of the complaint; and other pertinent information. Information that could lead to identification of a particular individual as having filed a complaint must be kept confidential. **29 CFR 37.37 (c)**

II. Webliography

Administrative Entity & Comprehensive Career Center Web Site

LWIA 1

<http://www.ab-t.org/ab-t.htm>

http://www.tennessee.gov/labor-wfd/cc/cccounty_files/washington.htm

LWIA 2

<http://www.ws.edu/>

http://www.tennessee.gov/labor-wfd/cc/cccounty_files/hamblen.htm

LWIA 3

<http://www.wforce@knoxcac.org>

<http://www.knxcareers.org/>

LWIA 4

<http://www.ethra.org/>

http://www.tennessee.gov/labor-wfd/cc/cccounty_files/cumberland.htm

LWIA 5

<http://www.sedev.org/setdd/>

<http://www.secareercenter.org/>

LWIA 6

http://www.tennessee.gov/labor-wfd/cc/cccounty_files/coffee.htm

LWIA 7

<http://www.uchra.org/>

<http://www.uccareercenter.com/>

LWIA 8

<http://www.workforceessentials.com/>

<http://www.workforceessentials.com/careercenter.html>

LWIA 9

<http://www.nashville.gov/flashpgs/flashhome.htm>

<http://www.careeradvancement.org/>

LWIA 10

<http://www.sctworkforce.org>

<http://www.sctcareercenter.com/>

LWIA 11

<http://www.unitedway.tn.org/community/sowhumre.htm>

<http://www.wtncc.tn.org/>

LWIA 12

http://www.tennessee.gov/labor-wfd/cc/cccounty_files/dyer.htm

LWIA 13

<http://www.cityofmemphis.org/>

<http://www.memphiscareercenter.com/>

State Web Sites

<http://www.tennessee.gov/labor-wfd/et.html> This is the homepage of the Division of Employment & Training, Department of Labor and Workforce Development

<http://www.tennessee.gov/labor-wfd/wiaplan.html> View the State's 5-Year Strategic Plan for WIA

http://www.tennessee.gov/labor-wfd/et_incumbent_faq.html View Frequently Asked Questions about the Incumbent Worker Program

<http://www.tennessee.gov/labor-wfd/graphics/TNmplwia.gif> View the LWIA map

<http://www.tennessee.gov/labor-wfd/Polsummary.pdf> View Policy and Policy Summaries from E&T

<http://www.tennessee.gov/labor-wfd/performance2003-04.pdf> E&T Performance Measures, 2005-2006

<http://www.ja.state.tn.us/thec/cbjt/PrSrchEng.jsp> View the List of Eligible Training Providers

<http://198.187.128.12/tennessee/lpext.dll?f=templates&fn=fs-main.htm&2.0> Tennessee Code Annotated

Federal Web Sites

<http://www.doleta.gov/> Employment and Training Administration, US Department of Labor

<http://www.doleta.gov/usworkforce/wia/act.cfm> View Public Law 105-220, WIA 1998

<http://www.whitehouse.gov/omb/egov> View Plans for eGovernment Initiative

<http://wdr.doleta.gov/directives/> ETA Training and Employment Guidance Letters/Advisories

<http://www.access.gpo.gov/nara/cfr/index.html> Search the Code of Federal Regulations

<http://www.whitehouse.gov/omb/circulars/a122/a122-2004.pdf> OMB, Circular A-122

<http://www.whitehouse.gov/omb/circulars/a133/a133.html> OMB, Circular A-133

<http://a257.g.akamaitech.net/7/257/2422/14mar20010800/edocket.access.gpo.gov/2003/pdf/03-13125.pdf> LEP Guidance, ETA

<http://uscode.house.gov/search/criteria.shtml> Search the United States Code

http://wdr.doleta.gov/opr/fulltext/FINALrep_02.pdf View the Urban Institute's preliminary report on employment and training activities at faith-based institutions

<http://www.eeoc.gov/policy/ada.html> View Americans With Disabilities Act of 1990

<http://www.access-board.gov/508.html> 36 CFR Part 1194, Electronic and Information Technology Accessibility Standards

<http://www.access-board.gov/telecomm/index.htm> 36 CFR Part 1193, Telecommunications Act Accessibility Guidelines

**Local Workforce Investment Areas
Administrative Entities
Revised 8/04/2006**

Area	Administrative Entity & WIA Contact
LWIA 1	<p>David Shanks, Executive Director Alliance for Business and Training, Inc. P.O. Box 249 386, Highway 91 Elizabethton, TN 37644-0249 Office: 423.547.7500 ext 121 FAX: 423.547.7527 E-mail: dshanks@ab-t.org</p> <p>Counties Served: Carter, Johnson, Sullivan, Unicoi, & Washington</p>
LWIA 2	<p>Dr. Nancy Benziger Brown, Ph.D. FAICP, Dean of Workforce Development Walters State Community College 500 South Davy Crockett Parkway Morristown, TN 37813-9989 Office: 423.318.2709 FAX: 423.585.6769 E-mail: nancy.brown@ws.edu Or brownnb@aol.com</p> <p>Counties Served: Claiborne, Cocke, Grainger, Greene, Hamblen, Hancock, Hawkins, Jefferson, Sevier, & Union</p>
LWIA 3	<p>Barbara Kelly, Executive Director Knoxville-Knox County CAC 2247 Western Avenue Knoxville, TN 37950-1650 Office: 865.546.3500 FAX: 865.546.0832 E-mail: barbara.kelly@knoxcac.org</p> <p>Counties Served: Knox</p>
LWIA 3	<p>Vaughn Smith, WIA Director Knoxville-Knox County CAC Workforce Connections 2247 Western Avenue Knoxville, TN 37950-1650 Office: 865.544.5200 FAX: 865.546.0832 E-mail: vaughn.smith@knoxcac.org</p> <p>Counties Served: Knox</p>
LWIA 4	<p>Gordon Acuff, Executive Director East Tennessee Human Resources Agency 9111 Cross Park Drive Suite D-100 Knoxville, TN 37923 Office: 865.691.2551 FAX: 865.531.7216 E-mail: Gacuff@ethra.org</p> <p>Anderson, Blount, Campbell, Cumberland, Loudon, Monroe, Morgan, Roane, and Scott</p>

**Local Workforce Investment Areas
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LWIA 4	<p>Debbie Petree, WIA Director East Tennessee Human Resources Agency Workforce Development 728E Emory Valley Oak Ridge, TN 37830 Office: 865.590.1052 ext 107 Cell: 865.705.8677 FAX: 865.590.1081 E-mail: Petree@lwia4.org</p>
LWIA 5	<p>Beth Jones, Executive Director Southeast Tennessee Development District 535 Chestnut St., P. O. Box 4757 Chattanooga, TN 37405 Office: 423.424.4241 FAX: 423.757.5491 E-mail: bjones@sedev.org</p> <p>Bledsoe, Bradley, Hamilton, Marion, McMinn, Meigs, Polk, Rhea, and Sequatchie</p>
LWIA 5	<p>Phyllis Casavant, Assistant Director Southeast Tennessee Development District 535 Chestnut St., P. O. Box 4757 Chattanooga, TN 37405 Office: 423.266.5781 Cell: 423.667.1013 FAX: 423.757.5491 E-mail: pcasavant@sedev.org</p>
LWIA 5	<p>Wanza Lee, WIA Director Southeast Tennessee Development District Suite 300 535 Chestnut St., P. O. Box 4757 Chattanooga, TN 37405-0757 Office: 423.757.5013 FAX: 423.757.5491 E-mail: wanza@sedev.org</p>
LWIA 6	<p>Gary Morgan, Executive Director Workforce Solutions 410 Wilson Ave. P.O. Box 1628 Tullahoma, TN 37388 Office: 931.455.9596 FAX: 931.455.9580 E-mail: gmorgan@workforcesolutionstn.org</p> <p>Counties Served: Bedford, Coffee, Franklin, Grundy, Lincoln, Moore, & Warren</p>

**Local Workforce Investment Areas
Administrative Entities
Revised 8/04/2006**

LWIA 7	<p>Phyllis Bennett, Executive Director Upper Cumberland Human Resource Agency 3313 Williams Enterprise Drive Cookeville, TN 38506 Office: 931.528.1127 Home: 931.537.6065 FAX: 931.526.8305 E-mail: pbennett0801@yahoo.com</p> <p>Cannon, Clay, DeKalb, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, and White</p>
LWIA 7	<p>Pat Callahan, WIA Director Upper Cumberland Human Resource Agency 3313 Williams Enterprise Drive Cookeville, TN 38506 Office: 931.528.1127 FAX: 931.526.8305 E-mail: lwia7@yahoo.com</p>
LWIA 8	<p>Marla Rye, Executive Director Workforce Essentials 110 Main Street Clarksville, TN 37040 Office: 931.551.9110 FAX: 931.551.9026 E-mail: mrje@workforceessentials.com</p> <p>Counties Served: Cheatham, Dickson, Houston, Humphreys, Montgomery, Robertson, Stewart, Sumner, & Williamson</p>
LWIA 9	<p>Dr. Christine Bradley, Executive Director The Nashville Career Advancement Center 621 Mainstream Drive, Suite 210 Nashville, TN 37228-1201 Office: 615.862.8890 FAX: 615.862.8910 E-mail: christine.bradley@nashville.gov</p> <p>Counties Served: Davidson, Rutherford, Trousdale, & Wilson</p>
LWIA 10	<p>Jan O. McKeel, Executive Director South Central Tennessee Workforce Board Eight Courthouse Square, 2nd Floor Columbia, TN 38401 Office: 931.375.4200 FAX: 931.381.7643 E-mail: Jan.McKeel@sctworkforce.org</p> <p>Counties Served: Giles, Hickman, Lawrence, Lewis, Marshall, Maury, Perry & Wayne</p>

**Local Workforce Investment Areas
Administrative Entities
Revised 8/04/2006**

LWIA 11	<p>Mike Smith, Executive Director Southwest Human Resource Agency P. O. Box 264 1527 White Avenue Henderson, TN 38340-0264 Office: 731.989.5111 FAX: 731.989.3095 E-mail: msmith@swhra.org</p> <p>Counties Served: Benton, Carroll, Chester, Decatur, Hardeman, Hardin, Haywood, Henderson, Henry, Madison, McNairy & Weakley</p>
LWIA 11	<p>Lafayette McKinnie, WIA Director Southwest Human Resource Agency 1314 Highway 45 North, Suite D Henderson, TN 38340 Office: 731.989.0533 FAX: 731.983.3149 E-mail: lmckinnie@swhra.org</p> <p>Counties Served: Benton, Carroll, Chester, Decatur, Hardeman, Hardin, Haywood, Henderson, Henry, Madison, McNairy & Weakley</p>
LWIA 12	<p>Dr. Karen Bowyer, President, WIA Director Dyersburg State Community College 1510 Lake Road Dyersburg, TN 38024 Office: 731.286.3301 Fax: 731.286.3269 E-mail: kbowyer@dsc.edu</p> <p>Counties Served: Crockett, Dyer, Gibson, Lake, Lauderdale, Obion, and Tipton</p>
LWIA 12	<p>Henry Lewis, Executive Director Northwest TN Workforce Board 313 West Cedar Street Dyersburg, TN 38024 Office: 731.286.3585 ext.16 Fax: 731.286.3584 E-mail: lewis@nwtworks.org</p> <p>Counties Served: Crockett, Dyer, Gibson, Lake, Lauderdale, Obion, and Tipton</p>
LWIA 13	<p>Isaac Garrett, Executive Director Workforce Investment Network or (WIN) 22 N. Front St. Suite 970 Memphis, TN 38103 Office: 901.576.6811 FAX: 901.576.6844 E-mail: isaac.garrett@memphistn.gov</p> <p>Counties Served: Fayette & Shelby</p>

**Local Workforce Investment Areas
Administrative Entities
Revised 8/04/2006**

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Tennessee Department of Labor & Workforce Development

Suite 100 Andrew Johnson Tower, 710 James Robertson Parkway
Nashville, TN 37243-0658

Contact: Susan K. Cowden

Title: Administrator, Employment and Workforce Development

Phone: 615.741.3874

Fax: 615.741.3003

Workforce Help Line 1.800.255.5872

Email: Susan.Cowden@state.tn.us

Website: <http://www.state.tn.us/labor-wfd/index.html>

SUMMARY OF RISK
ASSESSMENTS

Name of Organization: Tennessee Department of Labor and Workforce Development														
LOCAL WORKFORCE INVESTMENT AREAS →														
		1	2	3	4	5	6	7	8	9	10	11	12	13
Risk Categories	VALUES													
1. FEDERAL FUNDS EXPENDED DURING A FISCAL YEAR:														
< \$25,000	1													
> \$25,000 AND < \$100,000	2													
> \$100,000 AND <\$200,000	3													
> \$200,000 AND <\$300,000	4													
> \$300,000	5	5	5	5	5	5	5	5	5	5	5	5	5	5
2. PERCENT EXPENDED OF FEDERAL GRANTS:														
< 10%	5													
< 30%	4													
< 50%	3													
< 60%	2	2	2	2	2	2	2			2		2	2	2
< 80%	1							1	1		1			
3. MONITORING JUDGEMENT RISK:														
Little concern; review on request or monitor's discretion **	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Low concern; review every 5 years	2													
Moderate concern; review every 3-4 years	3													
Fairly high concern; review every 2 years	4													
High audit concern; review annually	5													
4. INTERNAL CONTROL:														
Average	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Minor weaknesses	2													
Some significant weaknesses	3													
Many significant weaknesses or no audit	4											4		
SUB-TOTAL														
		9	9	9	9	9	9	8	8	9	8	13	9	9

Score	Risk level
30 or less	Very low
30 to 40	Low
40 to 45	Medium
45 to 55	High
over 55	Very high

SUMMARY OF RISK
ASSESSMENTS

Name of Organization: Tennessee Department of Labor and Workforce Development															
LOCAL WORKFORCE INVESTMENT AREAS			1	2	3	4	5	6	7	8	9	10	11	12	13
Risk Categories	VALUES														
5. RESULTS OF PRIOR MONITORING AND OTHER SITE VISITS:															
No significant findings	1	1	1	1	1	1	1	1	1	1	1	1		1	1
Some minor findings	2												2		
Moderate findings or no prior audit	3														
Some significant findings	4														
Many significant findings	5														
6. NUMBER OF PROGRAMS FOR PERIOD BEING MONITORED:															
Single	1														
2-4	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
-5-	3														
6-7	4														
8 and over	5														
7. FINANCIAL/BUDGET IMPACT:															
Very little or no impact	1	1				1			1	1		1	1		
Little impact	2		2	2			2	2			2	2		2	2
Moderate impact	3			3											
High impact	4					4							4		
Very high impact	5		5			4		5						5	5
8. SIZE OF STAFF FOR PERIOD BEING MONITORED:															
Very Small (1-4)	1														
Small (5-8)	2	2	2	2	2	2	2	2	2	2	2	2		2	
Moderate (8-10)	3												3		3
Large (11-15)	4														
Very large (15 and over)	5														
9. MANAGEMENT INPUT/CONCERN:															
Very little	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
Some	2													2	2
Moderate	3														
Much	4														
High	5														
SUB-TOTAL			7	13	11	11	12	13	7	7	8	9	13	15	15

Score	Risk level
30 or less	Very low
30 to 40	Low
40 to 45	Medium
45 to 55	High
over 55	Very high

SUMMARY OF RISK
ASSESSMENTS

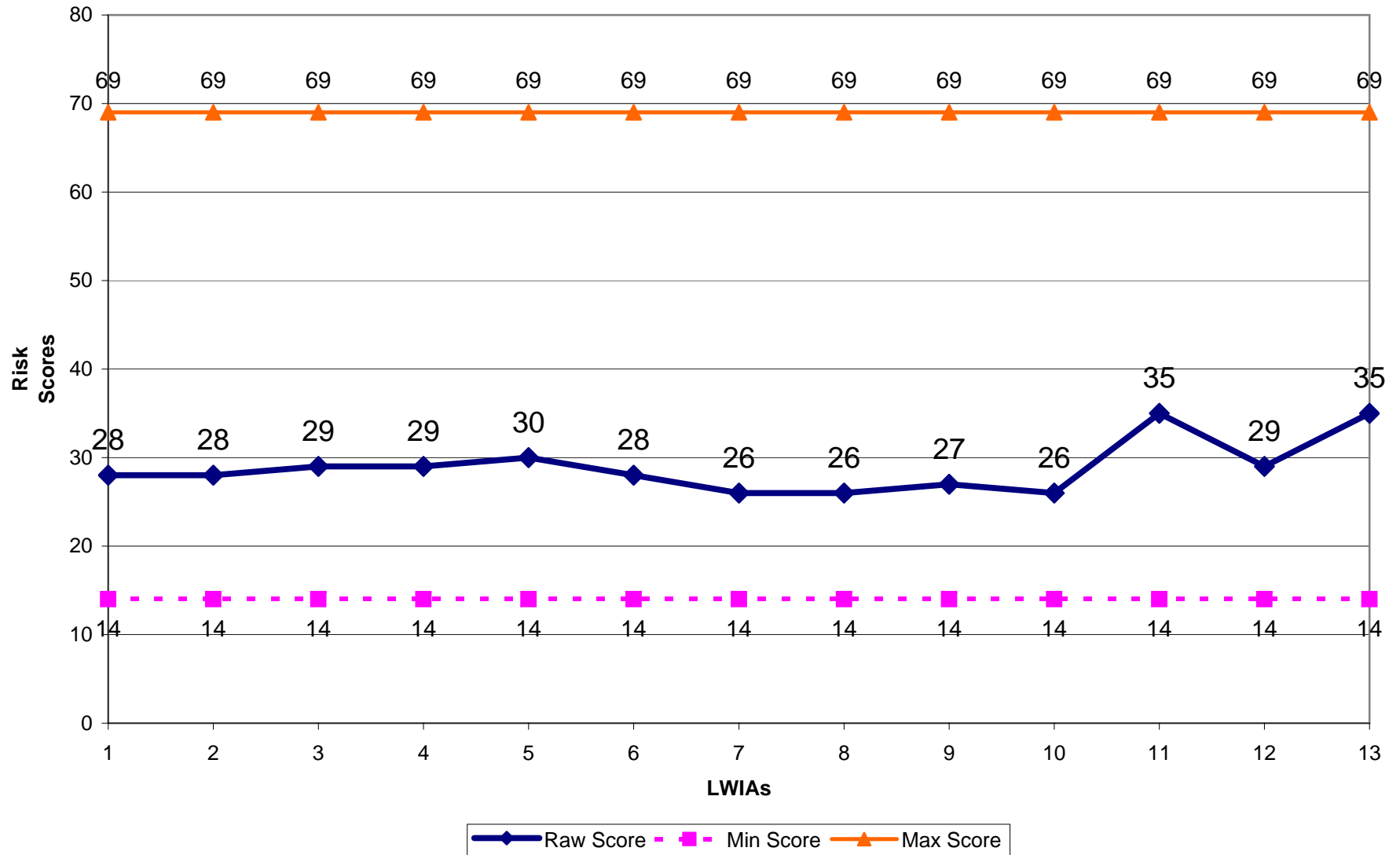
Name of Organization: Tennessee Department of Labor and Workforce Development														
LOCAL WORKFORCE INVESTMENT AREAS →		1	2	3	4	5	6	7	8	9	10	11	12	13
Risk Categories		VALUES												
10. RESULTS OF COLLATERAL CONTACTS, CUSTOMER SURVEYS, ETC.:														
Zero or small indication of risk		1	1	1	1	1	1	1	1	1	1	1	1	
Some indication of risk		2	2						2					2
Moderate indication of risk		3												
Large indication of risk		4												
Very large indication of risk		5												
11. BOARD OF DIRECTORS INVOLVEMENT:														
Very active board (provides appropriate oversight)		1			1				1	1				
Active board (takes interest in financial matters review reports)		2	2	2	2	2	2	2			2	2	2	
Moderately effective		3												3
Not very effective (Not sufficiently independent of management)		4												
Inactive board (does not meet regularly)		5												
12. EXPERIENCE WITH STATE/GOVERNMENT CONTRACTS:														
Over 10 years experience		1	1	1	1	1	1	1	1	1	1	1	1	1
Five to ten years experience		2												
Two to five years experience		3												
Less than two years experience		4												
Completely new		5												
13. CHANGES IN EQUIPMENT SYSTEMS & STAFF SINCE LAST REVIEW:														
No changes		1												
Moderate changes--low turnover		2	2	2	2	2	2	2	2	2	2	2	2	2
Equipment changes--low turnover		3												
High turnover		4												
High turnover & equipment systems change		5												
14. EXPOSURE TO LOSS:														
None		1												
Physical assets		2												
Readily negotiable		3												
Cash		4												
Confidential data		5	5	5	5	5	5	5	5	5	5	5	5	5
SUB-TOTAL			12	11	11	10	11	11	11	11	10	11	11	13
GRAND TOTAL RISK SCORE			28	33	31	30	32	33	26	26	27	28	37	37
** SEC 184 (a) 4 Monitoring : Each Governor of the state shall conduct on an Annual basis on site monitoring of each Local Area within the state or local government.														

Score	Risk level
30 or less	Very low
30 to 40	Low
40 to 45	Medium
45 to 55	High
over 55	Very high

SUMMARY OF RISK
ASSESSMENTS

Notes: Assumptions/Ratioanle:															
1. Federal Funds Expended during a fiscal year															
All LWIAs will bear the maximum risk for the federal funds expended (>\$300,000)															
2. Percent Expended of Federal Grants															
All LWIAs will expend greater than 50% grants															
3. Monitoring judgement risk															
Under SEC 184 (a) 4 Monitoring: Each Governor of the state shall conduct on an Annual basis on site monitoring of each Local Area within the state or local government.															
This monitoring judgement risk is weighted uniformly across all LWIAs; with emphasis on the note above.															
4. Internal Control															
Uniform Average Control weight applied because of controls in practice.															
5. Results of prior monitoring and other site visits															
Self explanatory															
6. Number of Programs for period being monitored															
This indicates the range number of the main programs being monitored															
7. Financial Budget Impact															
The Financial Budget Impact falls into very Little (or no impact) and Little impact categories; with "fall back"local government funds as secondary to WIA funds															
8. Size of Staff for period being monitored															
The underlying assumption is that Small to Moderate staff will suffice under normal circumstances.															
9. Management Input/Concern															
Self explanatory															
10. Results of collateral contacts, customer surveys, etc															
Zero or small indication of risk to some indication of risk															
11. Board of Directors Involvement															
Self explanatory															
12. Experience with State/Government Contracts															
All LWIAs weighted uniformly															
13. Changes in Equipment Systems & Staff since last review															
Moderate changes - low turnover															
14. Exposure to loss															
Participant confidential data custodianship and management bears maximum risk.															

Risk Assessment - LWIAs



LWIA	Raw Score	Min Score	Max Score
1	28	14	69
2	28	14	69
3	29	14	69
4	29	14	69
5	30	14	69
6	28	14	69
7	26	14	69
8	26	14	69
9	27	14	69
10	26	14	69
11	35	14	69
12	29	14	69
13	35	14	69

**HYPERLINK TO:
QUICK REFERENCE TO POLICY**

<http://www.state.tn.us/labor-wfd/Polsummary.pdf>



STATE OF TENNESSEE
DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT
DIVISION OF EMPLOYMENT AND WORKFORCE DEVELOPMENT

Andrew Johnson Tower
710 James Robertson Parkway 1st Floor
Nashville, TN 37243-0658
(615) 741-1031

June 27, 2006

Workforce Investment Act Memorandum Number 05-29, Chg. 1

Topic: Health and Human Services (HHS) Poverty Guidelines 2006 and the Department of Labor (DOL) Lower Living Standard Income Levels (LLSIL).

Subject: Notice of determination of income guidelines for persons defined as "low income individuals."

Purpose: To provide Local Workforce Investment Areas (LWIAs) with an income guideline table containing calculated poverty levels provided by HHS and Metro and Non-Metro LLSIL for the Southern region.

Background: The Workforce Investment Act (WIA) of 1998 (Public Law 105-220) defines the term "Low Income Individual" as one who qualifies under various criteria, including an individual who received income for a six-month period that does not exceed the higher of the poverty line or 70 percent of the LLSIL. Attached is a table containing the annual LLSIL for 2006 and the HHS poverty guidelines. The LLSIL is used for several purposes under WIA: specifically, WIA section 101(25) defines the term "low income individual" for eligibility purposes, sections 127(b)(2)(C) and 132 (b)(1)(IV) defines the terms "disadvantaged adult," and "disadvantaged youth" in terms for the poverty line of LLSIL for purposes of state allotments. The HHS 2006 poverty guidelines may be found on the Internet at <http://aspe.hhs.gov/poverty/06fedreg.htm>. The 2006 LLSIL is available on the Federal Register (Vol. 71, No. 105) web site at <http://www.archives.gov/federal-register/index.html>.


Instructions: A table is attached with the HHS poverty guidelines and 70 percent Metro and Non-Metro LLSIL. To use this table, compare the poverty level for the family size against either the Metro or Non-Metro LLSIL, depending on the county of residence, using the higher of the two in order to qualify the participant as disadvantaged under WIA. If the LWIA has reached limited funding the area will utilize this table to determine eligibility under the priority system (see E&T policy 00-11).

Contact: For questions regarding this policy contact Dan Holton, WIA Performance Coordinator, Employment and Workforce Development, at (615) 741-5326.

Effective Date: Immediate

Expiration Date: Indefinite

Approved: _____

A handwritten signature in black ink, appearing to read "Susan K. Cowden", is written over a horizontal line.

Susan Cowden, Administrator
Employment and Workforce Development

SC:DH:RK

Workforce Investment Income Guidelines 2006			
Family Size	Poverty Level	LLSIL* - Metro	LLSIL – Non-Metro
1	\$9,800	\$7,580	\$7,250
2	\$13,200	\$12,420	\$11,880
3	\$16,600	\$17,050	\$16,310
4	\$20,000	\$21,040	\$20,130
5	\$23,400	\$24,830	\$23,760
6	\$26,800	\$29,040	\$27,780
7	\$30,200	\$33,250	\$31,800
8	\$33,600	\$37,460	\$35,820
9	\$37,000	\$41,670	\$39,840
10	\$40,400	\$45,880	\$43,860
11	\$43,800	\$50,090	\$47,880
12	\$47,200	\$54,300	\$51,900
	Add \$3,400 for each additional family member	Add \$4,210 for each additional family member	Add \$4,020 for each additional family member
*Lower Living Standard Income Level			
To use this chart, compare the poverty level for the family size against either the Metro or Non-Metro LLSIL, depending on the county of residence, using the higher of the two.			
Note - Metro LLSIL levels can only be used for the following counties:			
Anderson, Blount, Carter, Cheatham, Chester, Davidson, Dickson, Fayette, Grainger, Hamilton, Hawkins, Jefferson, Knox, Madison, Marion, Montgomery, Robertson, Rutherford, Sequatchie, Sevier, Shelby, Sullivan, Sumner, Tipton, Unicoi, Union, Washington, Williamson, Wilson.			

Revised June 15, 2006

	A	B	C	D	E	K
1	DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT					
2	ANNUAL AGREEMENT MONITORING INFORMATION					
3	ATTACHMENT A					
4	AS OF JULY 10, 2006					
5						
6	Contract Number	LWIA	Contractor Name	Grant Contract Term	Maximum Liability	Risk factor
7						
8	LWIA 01					
9						
10	05-01-FY5-101-ADMIN	LWIA 01	SULLIVAN COUNTY	October 1, 2004-June 30, 2006	\$96,776.21	Medium
11	05-01-FY5-201-ADULT	LWIA 01	SULLIVAN COUNTY	October 1, 2004-June 30, 2006	\$541,736.72	Medium
12	05-01-FY5-401-DSLWK	LWIA 01	SULLIVAN COUNTY	October 1, 2004-June 30, 2006	\$329,249.20	Medium
13	05-01-PY4-101-ADMIN	LWIA 01	SULLIVAN COUNTY	April 1, 2004-June 30, 2006	\$108,896.90	Medium
14	05-01-PY4-201-ADULT	LWIA 01	SULLIVAN COUNTY	July 1, 2004-June 30, 2006	\$142,198.91	Medium
15	05-01-PY4-301-YOUTH	LWIA 01	SULLIVAN COUNTY	April 1, 2004-June 30, 2006	\$709,670.90	Medium
16	05-01-PY4-401-DSLWK	LWIA 01	SULLIVAN COUNTY	July 1, 2004-June 30, 2006	\$128,202.29	Medium
17	06-01-FY6-201-ADULT	LWIA 01	SULLIVAN COUNTY	October 1, 2005-June 30, 2007	\$783,507.00	Medium
18	06-01-FY6-101-ADMIN	LWIA 01	SULLIVAN COUNTY	October 1, 2005-June 30, 2007	\$128,234.00	Medium
19	06-01-FY6-401-DSLWK	LWIA 01	SULLIVAN COUNTY	October 1, 2005-June 30, 2007	\$370,599.00	Medium
20	06-01-PY5-101-ADMIN	LWIA 01	SULLIVAN COUNTY	April 1, 2005-June 30, 2007	\$127,350.10	Medium
21	06-01-PY5-201-ADULT	LWIA 01	SULLIVAN COUNTY	July 1, 2005-June 30, 2007	\$226,642.59	Medium
22	06-01-PY5-301-YOUTH	LWIA 01	SULLIVAN COUNTY	April 1, 2005 to June 30, 2007	\$768,618.90	Medium
23	06-01-PY5-401-DSLWK	LWIA 01	SULLIVAN COUNTY	July 1, 2005-June 30, 2007	\$150,889.41	Medium
24	07-01-PY6-101-ADMIN	LWIA 01	SULLIVAN COUNTY	April 1, 2006 to June 30, 2008	\$73,645.00	Medium
25	07-01-PY6-301-YOUTH	LWIA 01	SULLIVAN COUNTY	April 1, 2006 to June 30, 2008	\$662,812.00	Medium
26	05-49-FY5-1IW-STATE	LWIA 01	Alliance for Bus.&Training	August 15, 2005-June 30, 2006	\$87,685.00	Medium
27	05-49-PY4-1IW-NCNTV	LWIA 01	Alliance for Bus.&Training	July 18, 2005-June 30, 2006	\$55,000.00	Medium
28	05-49-PY4-2IW-NCNTV	LWIA 01	Alliance for Bus.&Training	July 26, 2005-June 30, 2006	\$26,400.00	Medium
29	06-49-FY6-1IW-STATE	LWIA 01	Alliance for Bus.&Training	April 18, 2006-June 30, 2006	\$41,535.00	Medium
30	06-49-PY5-1NC-STATE	LWIA 01	Alliance for Bus.&Training	July 1, 2005-June 30, 2006	\$74,521.81	Medium
31	06-49-PY5-2YU-STATE	LWIA 01	Alliance for Bus.&Training	Dec. 1, 2005-Dec. 1, 2006	\$44,656.00	Medium
32	06-49-PY5-3IW-STATE	LWIA 01	Alliance for Bus.&Training	Dec. 9, 2005-June 30, 2006	\$21,680.00	Medium
33						
34	LWIA 02					
35						
36	05-02-FY5-102-ADMIN	LWIA 02	HAWKINS COUNTY	October 1, 2004-June 30, 2006	\$144,009.63	Medium
37	05-02-FY5-202-ADULT	LWIA 02	HAWKINS COUNTY	October 1, 2004-June 30, 2006	\$884,894.60	Medium
38	05-02-FY5-402-DSLWK	LWIA 02	HAWKINS COUNTY	October 1, 2004-June 30, 2006	\$411,192.11	Medium

	A	B	C	D	E	K
39	05-02-PY4-102-ADMIN	LWIA 02	HAWKINS COUNTY	April 1, 2004-June 30, 2006	\$176,046.47	Medium
40	05-02-PY4-202-ADULT	LWIA 02	HAWKINS COUNTY	July 1, 2004-June 30, 2006	\$232,273.43	Medium
41	05-02-PY4-302-YOUTH	LWIA 02	HAWKINS COUNTY	April 1, 2004-June 30, 2006	\$1,192,035.83	Medium
42	05-02-PY4-402-DSLWK	LWIA 02	HAWKINS COUNTY	July 1, 2004-June 30, 2006	\$160,109.05	Medium
43	06-02-FY6-102-ADMIN	LWIA 02	HAWKINS COUNTY	October 1, 2005-June 30, 2007	\$165,162.20	Medium
44	06-02-FY6-202-ADULT	LWIA 02	HAWKINS COUNTY	October 1, 2005-June 30, 2007	\$1,115,195.13	Medium
45	06-02-FY6-402-DSLWK	LWIA 02	HAWKINS COUNTY	October 1, 2005-June 30, 2007	\$371,264.67	Medium
46	06-02-PY5-102-ADMIN	LWIA 02	HAWKINS COUNTY	April 1, 2005-June 30, 2007	\$192,015.40	Medium
47	06-02-PY5-202-ADULT	LWIA 02	HAWKINS COUNTY	July 1, 2005-June 30, 2007	\$312,690.96	Medium
48	06-02-PY5-302-YOUTH	LWIA 02	HAWKINS COUNTY	April 1, 2005 to June 30, 2007	\$1,264,286.70	Medium
49	06-02-PY5-402-DSLWK	LWIA 02	HAWKINS COUNTY	July 1, 2005-June 30, 2007	\$151,160.94	Medium
50	06-41-PY5-1NC-STATE	LWIA 02	Walters State Comm. College	July 1, 2005-June 30, 2006	\$70,685.48	Medium
51	06-41-PY5-2IW-STATE	LWIA 02	Walters State Comm. College	October 17, 2005-June 30, 2006	\$51,124.00	Medium
52	06-41-PY5-3IW-STATE	LWIA 02	Walters State Comm. College	Dec. 12, 2005-June 30, 2006	\$0.00	Medium
53	04-41-FY4-1DW-RSPNC	LWIA 02	Walters State Comm. College	January 5, 2006-June 30, 2006	\$225,000.00	Medium
54						
55	LWIA 03					
56						
57	05-03-FY5-103-ADMIN	LWIA 03	KNOX COUNTY	October 1, 2004-June 30, 2006	\$62,298.19	Medium
58	05-03-FY5-203-ADULT	LWIA 03	KNOX COUNTY	October 1, 2004-June 30, 2006	\$374,740.81	Medium
59	05-03-FY5-403-DSLWK	LWIA 03	KNOX COUNTY	October 1, 2004-June 30, 2006	\$185,942.87	Medium
60	05-03-PY4-103-ADMIN	LWIA 03	KNOX COUNTY	April 1, 2004-June 30, 2006	\$60,018.31	Medium
61	05-03-PY4-203-ADULT	LWIA 03	KNOX COUNTY	July 1, 2004-June 30, 2006	\$77,447.10	Medium
62	05-03-PY4-303-YOUTH	LWIA 03	KNOX COUNTY	April 1, 2004-June 30, 2006	\$359,286.28	Medium
63	05-03-PY4-403-DSLWK	LWIA 03	KNOX COUNTY	July 1, 2004-June 30, 2006	\$103,431.44	Medium
64	06-03-FY6-103-ADMIN	LWIA 03	KNOX COUNTY	October 1, 2005-June 30, 2007	\$89,447.40	Medium
65	06-03-FY6-203-ADULT	LWIA 03	KNOX COUNTY	October 1, 2005-June 30, 2007	\$483,892.92	Medium
66	06-03-FY6-403-DSLWK	LWIA 03	KNOX COUNTY	October 1, 2005-June 30, 2007	\$321,133.68	Medium
67	06-03-PY5-103-ADMIN	LWIA 03	KNOX COUNTY	April 1, 2005-June 30, 2007	\$70,325.80	Medium
68	06-03-PY5-203-ADULT	LWIA 03	KNOX COUNTY	July 1, 2005-June 30, 2007	\$145,820.70	Medium
69	06-03-PY5-303-YOUTH	LWIA 03	KNOX COUNTY	April 1, 2005 to June 30, 2007	\$356,361.30	Medium
70	06-03-PY5-403-DSLWK	LWIA 03	KNOX COUNTY	July 1, 2005-June 30, 2007	\$130,750.20	Medium
71	04-42-FY4-2MN-STATE	LWIA 03	Knox.-Knox Community Action	January 5, 2006-June 30, 2006	\$19,366.45	Medium
72	04-42-FY4-1DW-RSPNC	LWIA 03	Knox.-Knox Community Action	January 5, 2006-June 30, 2006	\$193,664.55	Medium
73	05-42-FY5-1IW-STATE	LWIA 03	Knox.-Knox Community Action	August 9, 2005-June 30, 2006	\$33,899.00	Medium
74	05-42-FY5-2IW-STATE	LWIA 03	Knox.-Knox Community Action	October 4, 2005-June 30, 2006	\$81,030.00	Medium
75	06-42-FY6-N42-NTLEG	LWIA 03	KNOX COUNTY	October 1, 2005-Sep. 30, 2006	\$123,375.00	Medium
76	06-42-PY5-1NC-STATE	LWIA 03	Knox.-Knox Community Action	July 1, 2005-June 30, 2006	\$37,243.51	Medium
77	06-42-PY5-2IW-STATE	LWIA 03	Knox.-Knox Community Action	October 17, 2005-June 30, 2006	\$2,860.00	Medium
78	06-42-PY5-3IW-STATE	LWIA 03	Knox.-Knox Community Action	October 20, 2005-June 30, 2006	\$30,074.00	Medium
79	06-42-WS6-H42-HKRCI	LWIA 03	Knox.-Knox Community Action	October 12, 2005-Dec.31, 2006	\$100,000.00	Medium
80						
81	LWIA 04					
82						

	A	B	C	D	E	K
83	05-04-FY5-104-ADMIN	LWIA 04	ROANE COUNTY	October 1, 2004-June 30, 2006	\$135,133.23	Medium
84	05-04-FY5-204-ADULT	LWIA 04	ROANE COUNTY	October 1, 2004-June 30, 2006	\$892,250.57	Medium
85	05-04-FY5-404-DSLWK	LWIA 04	ROANE COUNTY	October 1, 2004-June 30, 2006	\$323,948.49	Medium
86	05-04-PY4-104-ADMIN	LWIA 04	ROANE COUNTY	April 1, 2004-June 30, 2006	\$152,506.24	Medium
87	05-04-PY4-204-ADULT	LWIA 04	ROANE COUNTY	July 1, 2004-June 30, 2006	\$197,761.87	Medium
88	05-04-PY4-304-YOUTH	LWIA 04	ROANE COUNTY	April 1, 2004-June 30, 2006	\$994,596.66	Medium
89	05-04-PY4-404-DSLWK	LWIA 04	ROANE COUNTY	July 1, 2004-June 30, 2006	\$180,197.60	Medium
90	06-04-FY6-104-ADMIN	LWIA 04	ROANE COUNTY	October 1, 2005-June 30, 2007	\$128,659.10	Medium
91	06-04-FY6-204-ADULT	LWIA 04	ROANE COUNTY	October 1, 2005-June 30, 2007	\$832,222.53	Medium
92	06-04-FY6-404-DSLWK	LWIA 04	ROANE COUNTY	October 1, 2005-June 30, 2007	\$325,709.37	Medium
93	06-04-PY5-104-ADMIN	LWIA 04	ROANE COUNTY	April 1, 2005-June 30, 2007	\$141,892.60	Medium
94	06-04-PY5-204-ADULT	LWIA 04	ROANE COUNTY	July 1, 2005-June 30, 2007	\$236,429.82	Medium
95	06-04-PY5-304-YOUTH	LWIA 04	ROANE COUNTY	April 1, 2005 to June 30, 2007	\$907,991.10	Medium
96	06-04-PY5-404-DSLWK	LWIA 04	ROANE COUNTY	July 1, 2005-June 30, 2007	\$132,612.48	Medium
97	07-04-PY6-104-ADMIN	LWIA 04	ROANE COUNTY	April 1, 2006 to June 30, 2008	\$92,444.00	Medium
98	07-04-PY6-304-YOUTH	LWIA 04	ROANE COUNTY	April 1, 2006 to June 30, 2008	\$832,002.00	Medium
99	04-39-FY4-1FT-STATE	LWIA 04	East TN H. R. A.	February 16, 2005-June 30, 2006	\$123,860.00	Medium
100	04-39-FY4-4FT-STATE	LWIA 04	East TN H. R. A.	July 1, 2004-June 30, 2006	\$159,365.57	Medium
101	04-39-FY4-5IW-STATE	LWIA 04	East TN H. R. A.	August 31, 2005-June 30, 2006	\$112,032.00	Medium
102	04-39-FY4-6IW-STATE	LWIA 04	East TN H. R. A.	September 1, 2005-June 30, 2006	\$17,903.00	Medium
103	04-39-FY4-7IW-STATE	LWIA 04	East TN H. R. A.	August 31, 2005-June 30, 2006	\$16,552.00	Medium
104	04-39-FY4-1DW-RSPNC	LWIA 04	East TN H. R. A.	January 5, 2006-June 30, 2006	\$335,258.72	Medium
105	05-39-FY5-2FT-STATE	LWIA 04	East TN H. R.A.	September 19, 2005-Dec.30, 2006	\$40,000.00	Medium
106	05-39-FY5-3IW-STATE	LWIA 04	East TN H. R.A.	November 14, 2005-June 30, 2006	\$3,998.00	Medium
107	05-39-PY4-2IW-STATE	LWIA 04	East TN H. R.A.	April 7, 2006-June 30, 2006	\$14,183.00	Medium
108	06-39-PY5-1NC-STATE	LWIA 04	East TN H. R.A.	July 1, 2005-June 30, 2006	\$140,521.70	Medium
109	06-39-PY5-2IW-STATE	LWIA 04	East TN H. R.A.	October 11, 2005-June 30, 2006	\$21,896.00	Medium
110	06-39-PY5-3IW-STATE	LWIA 04	East TN H. R.A.	Nov. 14, 2005-June 30, 2006	\$18,216.00	Medium
111						
112	LWIA 05					
113						
114	05-05-FY5-105-ADMIN	LWIA 05	HAMILTON COUNTY	October 1, 2004-June 30, 2006	\$135,964.08	Medium
115	05-05-FY5-205-ADULT	LWIA 05	HAMILTON COUNTY	October 1, 2004-June 30, 2006	\$701,115.39	Medium
116	05-05-FY5-405-DSLWK	LWIA 05	HAMILTON COUNTY	October 1, 2004-June 30, 2006	\$522,561.31	Medium
117	05-05-PY4-105-ADMIN	LWIA 05	HAMILTON COUNTY	April 1, 2004-June 30, 2006	\$152,029.03	Medium
118	05-05-PY4-205-ADULT	LWIA 05	HAMILTON COUNTY	July 1, 2004-June 30, 2006	\$184,033.76	Medium
119	05-05-PY4-305-YOUTH	LWIA 05	HAMILTON COUNTY	April 1, 2004-June 30, 2006	\$980,753.78	Medium
120	05-05-PY4-405-DSLWK	LWIA 05	HAMILTON COUNTY	July 1, 2004-June 30, 2006	\$203,473.73	Medium
121	06-05-FY6-105-ADMIN	LWIA 05	HAMILTON COUNTY	October 1, 2005-June 30, 2007	\$165,167.00	Medium
122	06-05-FY6-205-ADULT	LWIA 05	HAMILTON COUNTY	October 1, 2005-June 30, 2007	\$789,417.00	Medium
123	06-05-FY6-405-DSLWK	LWIA 05	HAMILTON COUNTY	October 1, 2005-June 30, 2007	\$697,086.00	Medium
124	06-05-PY5-105-ADMIN	LWIA 05	HAMILTON COUNTY	April 1, 2005-June 30, 2007	\$169,608.20	Medium
125	06-05-PY5-205-ADULT	LWIA 05	HAMILTON COUNTY	July 1, 2005-June 30, 2007	\$204,692.40	Medium
126	06-05-PY5-305-YOUTH	LWIA 05	HAMILTON COUNTY	April 1, 2005 to June 30, 2007	\$1,037,962.80	Medium

	A	B	C	D	E	K
127	06-05-PY5-405-DSLWK	LWIA 05	HAMILTON COUNTY	July 1, 2005-June 30, 2007	\$283,818.60	Medium
128	07-05-PY6-105-ADMIN	LWIA 05	HAMILTON COUNTY	April 1, 2006 to June 30, 2008	\$111,749.00	Medium
129	07-05-PY6-305-YOUTH	LWIA 05	HAMILTON COUNTY	April 1, 2006 to June 30, 2008	\$1,005,749.00	Medium
130	04-52-FY4-1AD-STATE	LWIA 05	S/E TN Develop.District	May 17, 2005-May 17, 2006	\$50,000.00	Medium
131	04-52-FY4-2IW-STATE	LWIA 05	S/E TN Develop.District	Sep. 2, 2005-June 30, 2006	\$14,858.00	Medium
132	04-52-FY4-3IW-STATE	LWIA 05	S/E TN Develop.District	February 24, 2006-June 30, 2006	\$36,516.00	Medium
133	05-52-PY4-1NC-STATE	LWIA 05	S/E TN Develop.District	July 1, 2004 to June 30, 2006	\$73,360.00	Medium
134	05-52-PY4-1IW-NCNTV	LWIA 05	S/E TN Develop.District	July 11, 2005-June 30, 2006	\$55,000.00	Medium
135	05-52-PY4-2IW-NCNTV	LWIA 05	S/E TN Develop.District	July 11, 2005-June 30, 2006	\$99,543.00	Medium
136	06-52-FY6-N52-NTLEG	LWIA 05	S/E TN Develop.District	October 1, 2005-Sep.30, 2006	\$76,125.00	Medium
137	06-52-PY5-1NC-STATE	LWIA 05	S/E TN Develop.District	July 1, 2005-June 30, 2006	\$10,000.00	Medium
138	06-52-PY5-2AD-STATE	LWIA 05	S/E TN Develop.District	Jan.1, 2006-June 30, 2007	\$100,000.00	Medium
139	06-52-PY5-3SS-STATE	LWIA 05	S/E TN Develop.District	Jan.1, 2006-October 30, 2006	\$52,500.00	Medium
140	06-52-WS6-H52-HKRCI	LWIA 05	S/E TN Develop.District	October 12, 2005-Dec.31, 2006	\$100,000.00	Medium
141						
142	LWIA 06					
143						
144	05-06-FY5-106-ADMIN	LWIA 06	BEDFORD COUNTY	October 1, 2004-June 30, 2006	\$70,433.62	Medium
145	05-06-FY5-206-ADULT	LWIA 06	BEDFORD COUNTY	October 1, 2004-June 30, 2006	\$442,280.15	Medium
146	05-06-FY5-406-DSLWK	LWIA 06	BEDFORD COUNTY	October 1, 2004-June 30, 2006	\$191,622.42	Medium
147	05-06-PY4-106-ADMIN	LWIA 06	BEDFORD COUNTY	April 1, 2004-June 30, 2006	\$75,640.67	Medium
148	05-06-PY4-206-ADULT	LWIA 06	BEDFORD COUNTY	July 1, 2004-June 30, 2006	\$126,412.49	Medium
149	05-06-PY4-306-YOUTH	LWIA 06	BEDFORD COUNTY	April 1, 2004-June 30, 2006	\$479,639.01	Medium
150	05-06-PY4-406-DSLWK	LWIA 06	BEDFORD COUNTY	July 1, 2004-June 30, 2006	\$74,714.60	Medium
151	06-06-FY6-106-ADMIN	LWIA 06	BEDFORD COUNTY	October 1, 2005-June 30, 2007	\$89,945.30	Medium
152	06-06-FY6-206-ADULT	LWIA 06	BEDFORD COUNTY	October 1, 2005-June 30, 2007	\$507,517.20	Medium
153	06-06-FY6-406-DSLWK	LWIA 06	BEDFORD COUNTY	October 1, 2005-June 30, 2007	\$301,990.50	Medium
154	06-06-PY5-106-ADMIN	LWIA 06	BEDFORD COUNTY	April 1, 2005-June 30, 2007	\$82,632.20	Medium
155	06-06-PY5-206-ADULT	LWIA 06	BEDFORD COUNTY	July 1, 2005-June 30, 2007	\$150,732.99	Medium
156	06-06-PY5-306-YOUTH	LWIA 06	BEDFORD COUNTY	April 1, 2005 to June 30, 2007	\$470,001.60	Medium
157	06-06-PY5-406-DSLWK	LWIA 06	BEDFORD COUNTY	July 1, 2005-June 30, 2007	\$122,955.21	Medium
158	07-06-PY6-106-ADMIN	LWIA 06	GRUNDY COUNTY	April 1, 2006 to June 30, 2008	\$44,322.00	Medium
159	07-06-PY6-306-YOUTH	LWIA 06	GRUNDY COUNTY	April 1, 2006 to June 30, 2008	\$398,904.00	Medium
160	04-43-FY4-1AD-STATE	LWIA 06	Workforce Solutions	March 1, 2005-June 30, 2006	\$85,900.00	Medium
161	04-43-FY4-1DW-RSPNC	LWIA 06	Workforce Solutions	March 1, 2005-June 30, 2006	\$114,000.00	Medium
162	04-43-FY4-2DW-RSPNC	LWIA 06	Workforce Solutions	January 5, 2006-June 30, 2006	\$182,119.50	Medium
163	04-43-FY4-3IW-STATE	LWIA 06	Workforce Solutions	January 27, 2006-June 30, 2006	\$5,335.00	Medium
164	05-43-PY4-1IW-NCNTV	LWIA 06	Workforce Solutions	July 11, 2005-June 30, 2006	\$51,329.00	Medium
165	05-43-PY4-2IW-NCNTV	LWIA 06	Workforce Solutions	July 26, 2005-June 30, 2006	\$55,000.00	Medium
166	06-43-FY6-1YU-STATE	LWIA 06	Workforce Solutions	May 1, 2006-Dec. 31, 2006	\$81,401.00	Medium
167	06-43-PY5-1YU-STATE	LWIA 06	Workforce Solutions	July 1, 2005-June 30, 2007	\$45,000.00	Medium
168	06-43-PY5-2NC-STATE	LWIA 06	Workforce Solutions	July 1, 2005-June 30, 2006	\$80,836.24	Medium
169						
170	LWIA 07					

	A	B	C	D	E	K
171						
172	05-07-FY5-107-ADMIN	LWIA 07	PUTNAM COUNTY	October 1, 2004-June 30, 2006	\$89,312.31	Medium
173	05-07-FY5-207-ADULT	LWIA 07	PUTNAM COUNTY	October 1, 2004-June 30, 2006	\$489,945.57	Medium
174	05-07-FY5-407-DSLWK	LWIA 07	PUTNAM COUNTY	October 1, 2004-June 30, 2006	\$313,865.17	Medium
175	05-07-PY4-107-ADMIN	LWIA 07	PUTNAM COUNTY	April 1, 2004-June 30, 2006	\$95,782.95	Medium
176	05-07-PY4-207-ADULT	LWIA 07	PUTNAM COUNTY	July 1, 2004-June 30, 2006	\$128,604.40	Medium
177	05-07-PY4-307-YOUTH	LWIA 07	PUTNAM COUNTY	April 1, 2004-June 30, 2006	\$611,230.00	Medium
178	05-07-PY4-407-DSLWK	LWIA 07	PUTNAM COUNTY	July 1, 2004-June 30, 2006	\$122,212.10	Medium
179	06-07-FY6-107-ADMIN	LWIA 07	PUTNAM COUNTY	October 1, 2005-June 30, 2007	\$99,478.20	Medium
180	06-07-FY6-207-ADULT	LWIA 07	PUTNAM COUNTY	October 1, 2005-June 30, 2007	\$516,222.90	Medium
181	06-07-FY6-407-DSLWK	LWIA 07	PUTNAM COUNTY	October 1, 2005-June 30, 2007	\$379,080.90	Medium
182	06-07-PY5-107-ADMIN	LWIA 07	PUTNAM COUNTY	April 1, 2005-June 30, 2007	\$102,454.80	Medium
183	06-07-PY5-207-ADULT	LWIA 07	PUTNAM COUNTY	July 1, 2005-June 30, 2007	\$133,854.30	Medium
184	06-07-PY5-307-YOUTH	LWIA 07	PUTNAM COUNTY	April 1, 2005 to June 30, 2007	\$633,895.20	Medium
185	06-07-PY5-407-DSLWK	LWIA 07	PUTNAM COUNTY	July 1, 2005-June 30, 2007	\$154,343.70	Medium
186	07-07-PY6-107-ADMIN	LWIA 07	PUTNAM COUNTY	April 1, 2006 to June 30, 2008	\$54,402.00	Medium
187	07-07-PY6-307-YOUTH	LWIA 07	PUTNAM COUNTY	April 1, 2006 to June 30, 2008	\$489,618.00	Medium
188	05-40-FY5-1SS-STATE	LWIA 07	Upper Cumberland H.R.A.	July 1, 2005-June 30, 2006	\$60,000.00	Medium
189	05-40-FY5-2IW-STATE	LWIA 07	Upper Cumberland H.R.A.	July 29, 2005-June 30, 2006	\$111,433.00	Medium
190	05-40-FY5-3IW-STATE	LWIA 07	Upper Cumberland H.R.A.	August 15, 2005-June 30, 2006	\$57,967.00	Medium
191	05-40-FY5-4FT-STATE	LWIA 07	Upper Cumberland H.R.A.	September 1, 2005-June 30, 2006	\$220,000.00	Medium
192	05-40-FY5-5SS-STATE	LWIA 07	Upper Cumberland H.R.A.	October 1, 2005-March 1, 2007	\$252,992.00	Medium
193	05-40-PY4-2AD-STATE	LWIA 07	Upper Cumberland H.R.A.	July 1, 2005 to April 30, 2007	\$282,169.00	Medium
194	06-40-FY6-1AD-STATE	LWIA 07	Upper Cumberland H.R.A.	April 1, 2006-March 31, 2007	\$122,200.00	Medium
195	06-40-FY6-2YU-STATE	LWIA 07	Upper Cumberland H.R.A.	May 8, 2006-September 30, 2006	\$125,000.00	Medium
196	06-40-PY5-1DW-RSPNC	LWIA 07	Upper Cumberland H.R.A.	March 1, 2006-Sep. 31, 2007	\$250,000.00	Medium
197	06-40-PY5-1NC-STATE	LWIA 07	Upper Cumberland H.R.A.	July 1, 2005-June 30, 2006	\$43,557.94	Medium
198	06-40-PY5-2YU-STATE	LWIA 07	Upper Cumberland H.R.A.	Jan. 1, 2006-Dec. 30, 2006	\$44,000.00	Medium
199	04-40-FY4-1AD-STATE	LWIA 07	Upper Cumberland H.R.A.	May 25, 2005-June 30, 2006	\$121,595.32	Medium
200						
201	LWIA 08					
202						
203	05-08-FY5-108-ADMIN	LWIA 08	HUMPHREYS COUNTY	October 1, 2004-June 30, 2006	\$111,424.95	Medium
204	05-08-FY5-208-ADULT	LWIA 08	HUMPHREYS COUNTY	October 1, 2004-June 30, 2006	\$626,456.08	Medium
205	05-08-FY5-408-DSLWK	LWIA 08	HUMPHREYS COUNTY	October 1, 2004-June 30, 2006	\$376,368.44	Medium
206	05-08-PY4-108-ADMIN	LWIA 08	HUMPHREYS COUNTY	April 1, 2004-June 30, 2006	\$120,022.39	Medium
207	05-08-PY4-208-ADULT	LWIA 08	ROBERTSON COUNTY	July 1, 2004-June 30, 2006	\$176,376.05	Medium
208	05-08-PY4-308-YOUTH	LWIA 08	HUMPHREYS COUNTY	April 1, 2004-June 30, 2006	\$757,275.91	Medium
209	05-08-PY4-408-DSLWK	LWIA 08	HUMPHREYS COUNTY	July 1, 2004-June 30, 2006	\$146,549.48	Medium
210	06-08-FY6-108-ADMIN	LWIA 08	HUMPHREYS COUNTY	October 1, 2005-June 30, 2007	\$137,799.50	Medium
211	06-08-FY6-208-ADULT	LWIA 08	HUMPHREYS COUNTY	October 1, 2005-June 30, 2007	\$801,171.81	Medium
212	06-08-FY6-408-DSLWK	LWIA 08	HUMPHREYS COUNTY	October 1, 2005-June 30, 2007	\$439,023.69	Medium
213	06-08-PY5-108-ADMIN	LWIA 08	HUMPHREYS COUNTY	April 1, 2005-June 30, 2007	\$137,248.70	Medium
214	06-08-PY5-208-ADULT	LWIA 08	HUMPHREYS COUNTY	July 1, 2005-June 30, 2007	\$235,559.16	Medium

	A	B	C	D	E	K
215	06-08-PY5-308-YOUTH	LWIA 08	HUMPHREYS COUNTY	April 1, 2005 to June 30, 2007	\$820,930.50	Medium
216	06-08-PY5-408-DSLWK	LWIA 08	HUMPHREYS COUNTY	July 1, 2005-June 30, 2007	\$178,748.64	Medium
217	07-08-PY6-108-ADMIN	LWIA 08	HUMPHREYS COUNTY	April 1, 2006 to June 30, 2008	\$82,243.00	Medium
218	07-08-PY6-308-YOUTH	LWIA 08	HUMPHREYS COUNTY	April 1, 2006 to June 30, 2008	\$740,187.00	Medium
219	03-08-FY3-N08-NTLEG	LWIA 08	WORKFORCE ESSENTIALS	April 30, 2003 to June 30, 2007	\$3,849,633.00	Medium
220	04-48-PY3-6IW-STATE	LWIA 08	Workforce Essentials,Inc.	July 26, 2005-June 30, 2006	\$41,140.00	Medium
221	04-48-FY4-1AD-STATE	LWIA 08	Workforce Essentials,Inc.	January 1, 2005-June 30, 2006	\$82,500.00	Medium
222	04-48-FY4-1DW-RSPNC	LWIA 08	ROBERTSON COUNTY	February 1, 2005-June 30, 2006	\$333,330.00	Medium
223	04-48-FY4-2DW-RSPNC	LWIA 08	Workforce Essentials,Inc.	January 5, 2006-June 30, 2006	\$264,759.57	Medium
224	04-48-FY4-5FT-STATE	LWIA 08	Workforce Essentials,Inc.	April1, 2005-June 30, 2006	\$104,500.00	Medium
225	04-48-FY4-6SS-STATE	LWIA 08	Workforce Essentials,Inc.	July 12, 2005-June 30, 2006	\$78,380.00	Medium
226	04-48-PY3-1IW-NCNTV	LWIA 08	WORKFORCE ESSENTIALS	August 31, 2005-June 30, 2006	\$14,685.00	Medium
227	05-48-FY5-1DW-RSPNC	LWIA 08	Workforce Essentials,Inc.	January 5, 2006-Dec.31, 2006	\$200,000.00	Medium
228	05-48-FY5-1FT-STATE	LWIA 08	Workforce Essentials,Inc.	August 1, 2005-August 31, 2006	\$41,524.00	Medium
229	05-48-FY5-2FT-STATE	LWIA 08	Workforce Essentials,Inc.	October 11, 2005-June 30, 2006	\$14,080.00	Medium
230	05-48-PY4-1IW-NCNTV	LWIA 08	WORKFORCE ESSENTIALS	July 11, 2005-June 30, 2006	\$67,390.00	Medium
231	05-48-PY4-2FT-STATE	LWIA 08	Workforce Essentials,Inc.	April 1, 2006-March 31, 2007	\$8,448.00	Medium
232	05-48-PY4-2IW-NCNTV	LWIA 08	WORKFORCE ESSENTIALS	July 22, 2005-June 30, 2006	\$17,600.00	Medium
233	05-48-PY4-3IW-NCNTV	LWIA 08	WORKFORCE ESSENTIALS	July 20, 2005-June 30, 2006	\$28,512.00	Medium
234	06-48-FY6-1FT-STATE	LWIA 08	ROBERTSON COUNTY	January 18, 2006-June 30, 2006	\$275,000.00	Medium
235	06-48-FY6-2FT-STATE	LWIA 08	ROBERTSON COUNTY	February 1, 2006-June 30, 2006	\$66,000.00	Medium
236	06-48-FY6-3IW-STATE	LWIA 08	ROBERTSON COUNTY	April 18, 2006-June 30, 2006	\$25,300.00	Medium
237	06-48-FY6-N48-NTLEG	LWIA 08	WORKFORCE ESSENTIALS	October 1, 2005-Sep.30, 2006	\$37,500.00	Medium
238	06-48-PY5-1NC-STATE	LWIA 08	ROBERTSON COUNTY	July 1, 2005-June 30, 2006	\$74,842.24	Medium
239	06-48-PY5-2FT-STATE	LWIA 08	Workforce Essentials,Inc.	Decmber 1, 2005-Nov. 30, 2006	\$55,000.00	Medium
240	06-48-PY5-3FT-STATE	LWIA 08	Workforce Essentials,Inc.	September 1, 2005-June 30, 2006	\$9,123.00	Medium
241	06-48-PY5-4IW-STATE	LWIA 08	Workforce Essentials,Inc.	January 3, 2006-June 30, 2006	\$18,586.00	Medium
242	06-48-WS6-H48-HKRCI	LWIA 08	ROBERTSON COUNTY	October 12, 2005-Dec.31, 2006	\$200,000.00	Medium
243						
244	LWIA 09					
245						
246	05-09-FY5-109-ADMIN	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	October 1, 2004-June 30, 2006	\$191,607.14	Medium
247	05-09-FY5-209-ADULT	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	October 1, 2004-June 30, 2006	\$1,088,675.85	Medium
248	05-09-FY5-409-DSLWK	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	October 1, 2004-June 30, 2006	\$635,788.36	Medium
249	05-09-PY4-109-ADMIN	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	April 1, 2004-June 30, 2006	\$183,795.28	Medium
250	05-09-PY4-209-ADULT	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	July 1, 2004-June 30, 2006	\$320,338.63	Medium
251	05-09-PY4-309-YOUTH	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	April 1, 2004-June 30, 2006	\$1,086,257.05	Medium
252	05-09-PY4-409-DSLWK	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	July 1, 2004-June 30, 2006	\$247,561.82	Medium
253	06-09-FY6-109-ADMIN	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	October 1, 2005-June 30, 2007	\$246,861.80	Medium
254	06-09-FY6-209-ADULT	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	October 1, 2005-June 30, 2007	\$1,408,490.90	Medium
255	06-09-FY6-409-DSLWK	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	October 1, 2005-June 30, 2007	\$813,265.30	Medium
256	06-09-PY5-109-ADMIN	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	April 1, 2005-June 30, 2007	\$230,642.30	Medium

	A	B	C	D	E	K
257	06-09-PY5-209-ADULT	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	July 1, 2005-June 30, 2007	\$416,749.20	Medium
258	06-09-PY5-309-YOUTH	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	April 1, 2005 to June 30, 2007	\$1,327,910.40	Medium
259	06-09-PY5-409-DSLWK	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	July 1, 2005-June 30, 2007	\$331,121.10	Medium
260	06-09-PY5-4SS-STATE	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	January 1, 2006-Dec. 31, 2007	\$173,204.00	Medium
261	06-09-WS6-H09-HKRCI	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	October 12, 2005-Dec. 31, 2006	\$100,000.00	Medium
262	05-09-FY5-1IW-STATE	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	Sep. 27, 2005-June 30, 2006	\$45,539.00	Medium
263	05-09-PY4-1AD-STATE	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	August 30, 2004-July 31, 2007	\$121,495.00	Medium
264	06-09-FY6-1FT-STATE	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	February 1, 2006-Dec. 31, 2006	\$110,000.00	Medium
265	06-09-PY5-1NC-STATE	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	July 1, 2005-June 30, 2006	\$19,000.00	Medium
266	06-09-PY5-2IW-STATE	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	Sep.20, 2005-June 30, 2006	\$84,728.00	Medium
267	06-09-PY5-3IW-STATE	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	October 17, 2005-June 30, 2006	\$39,133.00	Medium
268	06-09-FY6-N09-NTLEG	LWIA 09	METRO NASHVILLE & DAVIDSON COUNTY	October 1, 2005-Sep.30, 2006	\$83,000.00	Medium
269						
270	LWIA 10					
271						
272	05-10-FY5-110-ADMIN	LWIA 10	HICKMAN COUNTY	October 1, 2004-June 30, 2006	\$118,307.09	Medium
273	05-10-FY5-210-ADULT	LWIA 10	HICKMAN COUNTY	October 1, 2004-June 30, 2006	\$805,761.16	Medium
274	05-10-FY5-410-DSLWK	LWIA 10	HICKMAN COUNTY	October 1, 2004-June 30, 2006	\$259,002.62	Medium
275	05-10-PY4-110-ADMIN	LWIA 10	HICKMAN COUNTY	April 1, 2004-June 30, 2006	\$139,155.72	Medium
276	05-10-PY4-210-ADULT	LWIA 10	HICKMAN COUNTY	July 1, 2004-June 30, 2006	\$182,365.56	Medium
277	05-10-PY4-310-YOUTH	LWIA 10	HICKMAN COUNTY	April 1, 2004-June 30, 2006	\$925,964.70	Medium
278	05-10-PY4-410-DSLWK	LWIA 10	HICKMAN COUNTY	July 1, 2004-June 30, 2006	\$144,071.21	Medium
279	06-10-FY6-110-ADMIN	LWIA 10	HICKMAN COUNTY	October 1, 2005-June 30, 2007	\$105,206.60	Medium
280	06-10-FY6-210-ADULT	LWIA 10	HICKMAN COUNTY	October 1, 2005-June 30, 2007	\$730,587.33	Medium
281	06-10-FY6-410-DSLWK	LWIA 10	HICKMAN COUNTY	October 1, 2005-June 30, 2007	\$216,272.07	Medium
282	06-10-PY5-110-ADMIN	LWIA 10	HICKMAN COUNTY	April 1, 2005-June 30, 2007	\$126,425.40	Medium
283	06-10-PY5-210-ADULT	LWIA 10	HICKMAN COUNTY	July 1, 2005-June 30, 2007	\$115,782.66	Medium
284	06-10-PY5-310-YOUTH	LWIA 10	HICKMAN COUNTY	April 1, 2005 to June 30, 2007	\$846,631.80	Medium
285	06-10-PY5-410-DSLWK	LWIA 10	HICKMAN COUNTY	July 1, 2005-June 30, 2007	\$175,414.14	Medium
286	07-10-PY6-110-ADMIN	LWIA 10	HICKMAN COUNTY	April 1, 2006 to June 30, 2008	\$72,659.00	Medium
287	07-10-PY6-310-YOUTH	LWIA 10	HICKMAN COUNTY	April 1, 2006 to June 30, 2008	\$653,936.00	Medium
288	04-53-PY3-3AD-STATE	LWIA 10	S. C.TN Workforce Alliance	June 30, 2004-June 30, 2006	\$255,420.00	Medium
289	04-53-FY4-2DW-RSPNC	LWIA 10	S. C.TN Workforce Alliance	October 1, 2005-June 30, 2006	\$355,591.00	Medium
290	04-53-FY4-2IW-STATE	LWIA 10	S. C.TN Workforce Alliance	Sep. 1, 2005-June 30, 2006	\$11,510.00	Medium
291	04-53-FY4-3IW-STATE	LWIA 10	S. C.TN Workforce Alliance	Sep. 2, 2005-June 30, 2006	\$9,900.00	Medium
292	04-53-FY4-5IW-STATE	LWIA 10	S. C.TN Workforce Alliance	Jaunary 27, 2006-June 30, 2006	\$21,720.00	Medium
293	04-53-FY4-N53-NTLEG	LWIA 10	S. C.TN Workforce Alliance	June 4, 2004-June 30, 2006	\$420,000.00	Medium
294	05-53-FY5-253-RSPNC	LWIA 10	S. C.TN Workforce Alliance	June 1, 2006-Sep.30, 2006	\$350,000.00	Medium
295	05-53-FY5-2SS-STATE	LWIA 10	S. C.TN Workforce Alliance	July 1, 2005-October 31, 2006	\$179,336.00	Medium
296	05-53-FY5-3IW-STATE	LWIA 10	S. C.TN Workforce Alliance	Sep.6, 2005- June 30, 2006	\$136,994.00	Medium
297	05-53-FY5-653-RSPNC	LWIA 10	S. C.TN Workforce Alliance	August 1, 2004-June 30, 2006	\$497,123.50	Medium
298	05-53-PY4-1NC-STATE	LWIA 10	S. C.TN Workforce Alliance	July 1, 2004 to June 30, 2006	\$20,000.00	Medium
299	05-53-PY4-2IW-STATE	LWIA 10	S. C.TN Workforce Alliance	Sep.1, 2005 to June 30, 2006	\$11,000.00	Medium
300	06-53-FY6-1FT-STATE	LWIA 10	S. C.TN Workforce Alliance	May 1, 2006-April 30, 2007	\$24,640.00	Medium

	A	B	C	D	E	K
301	06-53-PY5-1DW-RSPNC	LWIA 10	S. C.TN Workforce Alliance	February 1, 2006-June 30, 2006	\$350,000.00	Medium
302	06-53-PY5-1NC-STATE	LWIA 10	S. C.TN Workforce Alliance	July 1, 2005-June 30, 2006	\$68,173.89	Medium
303	06-53-PY5-2MN-STATE	LWIA 10	S. C.TN Workforce Alliance	October 1, 2005-June 30, 2006	\$40,559.00	Medium
304	06-53-PY5-3YU-STATE	LWIA 10	S. C.TN Workforce Alliance	January 1, 2006-June 30, 2006	\$30,000.00	Medium
305						
306	LWIA 11					
307						
308	05-11-FY5-111-ADMIN	LWIA 11	CHESTER COUNTY	October 1, 2004-June 30, 2006	\$169,536.25	Medium
309	05-11-FY5-211- ADULT	LWIA 11	CHESTER COUNTY	October 1, 2004-June 30, 2006	\$989,967.09	Medium
310	05-11-FY5-411-DSLWK	LWIA 11	CHESTER COUNTY	October 1, 2004-June 30, 2006	\$535,859.14	Medium
311	05-11-PY4-111-ADMIN	LWIA 11	CHESTER COUNTY	April 1, 2004-June 30, 2006	\$196,166.98	Medium
312	05-11-PY4-211- ADULT	LWIA 11	CHESTER COUNTY	July 1, 2004-June 30, 2006	\$259,853.62	Medium
313	05-11-PY4-311-YOUTH	LWIA 11	CHESTER COUNTY	April 1, 2004-June 30, 2006	\$1,296,997.66	Medium
314	05-11-PY4-411-DSLWK	LWIA 11	CHESTER COUNTY	July 1, 2004-June 30, 2006	\$208,651.60	Medium
315	06-11-FY6-111-ADMIN	LWIA 11	CHESTER COUNTY	October 1, 2005-June 30, 2007	\$160,140.60	Medium
316	06-11-FY6-211- ADULT	LWIA 11	CHESTER COUNTY	October 1, 2005-June 30, 2007	\$1,003,131.00	Medium
317	06-11-FY6-411-DSLWK	LWIA 11	CHESTER COUNTY	October 1, 2005-June 30, 2007	\$438,134.40	Medium
318	06-11-PY5-111-ADMIN	LWIA 11	CHESTER COUNTY	April 1, 2005-June 30, 2007	\$196,871.60	Medium
319	06-11-PY5-211- ADULT	LWIA 11	CHESTER COUNTY	July 1, 2005-June 30, 2007	\$260,107.20	Medium
320	06-11-PY5-311-YOUTH	LWIA 11	CHESTER COUNTY	April 1, 2005 to June 30, 2007	\$1,333,350.00	Medium
321	06-11-PY5-411-DSLWK	LWIA 11	CHESTER COUNTY	July 1, 2005-June 30, 2007	\$178,387.20	Medium
322	07-11-PY6-111-ADMIN	LWIA 11	CHESTER COUNTY	April 1, 2006 to June 30, 2008	\$114,430.00	Medium
323	07-11-PY6-311-YOUTH	LWIA 11	CHESTER COUNTY	April 1, 2006 to June 30, 2008	\$1,029,875.00	Medium
324	04-45-PY3-3IW-STATE	LWIA 11	Southwest H. R. A.	February 1, 2006-June 30, 2006	\$26,802.00	Medium
325	04-45-FY4-1AD-STATE	LWIA 11	Southwest H. R. A.	Jan.3, 2005-June 30, 2006	\$120,890.00	Medium
326	04-45-FY4-2AD-STATE	LWIA 11	Southwest H. R. A.	May 1, 2005-June 30, 2006	\$136,840.00	Medium
327	04-45-FY4-5AD-STATE	LWIA 11	Southwest H. R. A.	April 1, 2005-June 30, 2006	\$133,362.00	Medium
328	04-45-FY4-7IW-STATE	LWIA 11	Southwest H. R. A.	July 26, 2005-June 30, 2006	\$9,460.00	Medium
329	04-45-PY3-3IW-NCNTV	LWIA 11	Southwest H. R. A.	August 31, 2005-June 30, 2006	\$22,985.00	Medium
330	05-45-FY5-3SS-STATE	LWIA 11	Southwest H. R. A.	October 1, 2005-Oct.30, 2006	\$51,723.00	Medium
331	05-45-PY4-1IW-NCNTV	LWIA 11	Southwest H. R. A.	July 18, 2005-June 30, 2006	\$17,160.00	Medium
332	05-45-PY4-2IW-NCNTV	LWIA 11	Southwest H. R. A.	July 18, 2005-June 30, 2006	\$43,538.00	Medium
333	05-45-FY5-1SS-STATE	LWIA 11	Southwest H. R. A.	August 1, 2005-June 30, 2007	\$139,700.00	Medium
334	05-45-FY5-2IW-STATE	LWIA 11	Southwest H. R. A.	July 26, 2005-June 30, 2006	\$64,927.00	Medium
335	06-45-FY6-1FT-STATE	LWIA 11	Southwest H. R. A.	March 29, 2006-Dec. 31, 2006	\$33,792.00	Medium
336	06-45-FY6-N45-NTLEG	LWIA 11	Southwest H. R. A.	October 1, 2005-Sep.30, 2006	\$60,000.00	Medium
337	06-45-PY5-1SS-STATE	LWIA 11	Southwest H. R. A.	August 1, 2005-August 31, 2007	\$90,145.00	Medium
338	06-45-PY5-2NC-STATE	LWIA 11	Southwest H. R. A.	July 1, 2005-June 30, 2006	\$68,617.19	Medium
339	06-45-PY5-3IW-STATE	LWIA 11	Southwest H. R. A.	Sept. 20, 2005-June 30, 2006	\$13,200.00	Medium
340	06-45-PY5-4IW-STATE	LWIA 11	Southwest H. R. A.	March 8, 2006-June 30, 2006	\$22,914.00	Medium
341	06-45-WS6-H45-HKRCI	LWIA 11	Southwest H. R. A.	October 12, 2005-Dec. 31, 2006	\$100,000.00	Medium
342						
343	LWIA 12					
344						

	A	B	C	D	E	K
345	05-12-FY5-112-ADMIN	LWIA 12	DYER COUNTY	October 1, 2004-June 30, 2006	\$89,624.70	Medium
346	05-12-FY5-212-ADULT	LWIA 12	DYER COUNTY	October 1, 2004-June 30, 2006	\$547,574.90	Medium
347	05-12-FY5-412-DSLWK	LWIA 12	DYER COUNTY	October 1, 2004-June 30, 2006	\$259,047.42	Medium
348	05-12-PY4-112-ADMIN	LWIA 12	DYER COUNTY	April 1, 2004-June 30, 2006	\$112,183.08	Medium
349	05-12-PY4-212-ADULT	LWIA 12	DYER COUNTY	July 1, 2004-June 30, 2006	\$143,731.36	Medium
350	05-12-PY4-312-YOUTH	LWIA 12	DYER COUNTY	April 1, 2004-June 30, 2006	\$765,049.09	Medium
351	05-12-PY4-412-DSLWK	LWIA 12	DYER COUNTY	July 1, 2004-June 30, 2006	\$100,867.29	Medium
352	06-12-FY6-112-ADMIN	LWIA 12	DYER COUNTY	October 1, 2005-June 30, 2007	\$114,741.10	Medium
353	06-12-FY6-212-ADULT	LWIA 12	DYER COUNTY	October 1, 2005-June 30, 2007	\$766,051.38	Medium
354	06-12-FY6-412-DSLWK	LWIA 12	DYER COUNTY	October 1, 2005-June 30, 2007	\$266,618.52	Medium
355	06-12-PY5-112-ADMIN	LWIA 12	DYER COUNTY	April 1, 2005-June 30, 2007	\$133,993.60	Medium
356	06-12-PY5-212-ADULT	LWIA 12	DYER COUNTY	July 1, 2005-June 30, 2007	\$215,527.86	Medium
357	06-12-PY5-312-YOUTH	LWIA 12	DYER COUNTY	April 1, 2005 to June 30, 2007	\$881,860.50	Medium
358	06-12-PY5-412-DSLWK	LWIA 12	DYER COUNTY	July 1, 2005-June 30, 2007	\$108,554.04	Medium
359	07-12-PY6-112-ADMIN	LWIA 12	DYER COUNTY	April 1, 2006 to June 30, 2008	\$75,682.00	Medium
360	07-12-PY6-312-YOUTH	LWIA 12	DYER COUNTY	April 1, 2006 to June 30, 2008	\$681,146.00	Medium
361	04-50-FY4-1DW-RSPNC	LWIA 12	Dyersburg State Comm.Coll.	May 1, 2005-June 30, 2006	\$368,091.85	Medium
362	04-50-FY4-2AD-STATE	LWIA 12	Dyersburg State Comm.Coll.	May 1, 2005-June 30, 2006	\$100,000.00	Medium
363	04-50-FY4-3AD-STATE	LWIA 12	Dyersburg State Comm.Coll.	May 11, 2006-June 30, 2006	\$70,000.00	Medium
364	04-50-PY3-1DW-RSPNC	LWIA 12	Dyersburg State Comm.Coll.	January 5, 2006-June 30, 2006	\$43,173.23	Medium
365	04-50-PY3-2IW-NCNTV	LWIA 12	Dyersburg State Comm.Coll.	March 31, 2006=June 30, 2006	\$23,041.00	Medium
366	05-50-FY5-1AD-STATE	LWIA 12	Dyersburg State Comm.Coll.	September 1, 2005-June 30, 2006	\$130,000.00	Medium
367	05-50-FY5-1DW-RSPNC	LWIA 12	Dyersburg State Comm.Coll.	January 5, 2006-Dec. 31, 2006	\$202,500.00	Medium
368	05-50-FY5-2IW-STATE	LWIA 12	Dyersburg State Comm.Coll.	Sep. 27, 2005-June 30, 2006	\$132,000.00	Medium
369	05-50-PY4-2AD-STATE	LWIA 12	Dyersburg State Comm.Coll.	Jan 1, 2005-June 30, 2006	\$154,485.00	Medium
370	06-50-FY6-1SS-STATE	LWIA 12	Dyersburg State Comm.Coll.	July 1, 2006-Dec. 31, 2007	\$197,824.00	Medium
371	06-50-FY6-2AD-STATE	LWIA 12	Dyersburg State Comm.Coll.	May 11, 2006-September 30, 2006	\$80,000.00	Medium
372	06-50-PY5-1NC-STATE	LWIA 12	Dyersburg State Comm.Coll.	July 1, 2005-June 30, 2006	\$12,000.00	Medium
373	06-50-PY5-2IW-STATE	LWIA 12	Dyersburg State Comm.Coll.	Dec.9, 2005-June 30, 2006	\$55,000.00	Medium
374						
375	LWIA 13					
376						
377	05-13-FY5-113-ADMIN	LWIA 13	CITY OF MEMPHIS	October 1, 2004-June 30, 2006	\$315,601.95	Medium
378	05-13-FY5-213-ADULT	LWIA 13	CITY OF MEMPHIS	October 1, 2004-June 30, 2006	\$1,857,025.92	Medium
379	05-13-FY5-413-DSLWK	LWIA 13	CITY OF MEMPHIS	October 1, 2004-June 30, 2006	\$983,391.61	Medium
380	05-13-PY4-113-ADMIN	LWIA 13	CITY OF MEMPHIS	April 1, 2004-June 30, 2006	\$274,625.76	Medium
381	05-13-PY4-213-ADULT	LWIA 13	CITY OF MEMPHIS	July 1, 2004-June 30, 2006	\$487,445.39	Medium
382	05-13-PY4-313-YOUTH	LWIA 13	CITY OF MEMPHIS	April 1, 2004-June 30, 2006	\$2,471,631.81	Medium
383	05-13-PY4-413-DSLWK	LWIA 13	CITY OF MEMPHIS	July 1, 2004-June 30, 2006	\$382,910.77	Medium
384	06-13-FY6-113-ADMIN	LWIA 13	CITY OF MEMPHIS	October 1, 2005-June 30, 2007	\$392,669.40	Medium
385	06-13-FY6-213-ADULT	LWIA 13	CITY OF MEMPHIS	October 1, 2005-June 30, 2007	\$2,158,816.50	Medium
386	06-13-FY6-413-DSLWK	LWIA 13	CITY OF MEMPHIS	October 1, 2005-June 30, 2007	\$1,375,208.10	Medium
387	06-13-PY5-113-ADMIN	LWIA 13	CITY OF MEMPHIS	April 1, 2005-June 30, 2007	\$464,639.30	Medium
388	06-13-PY5-213-ADULT	LWIA 13	CITY OF MEMPHIS	July 1, 2005-June 30, 2007	\$727,746.20	Medium

	A	B	C	D	E	K
389	06-13-PY5-313-YOUTH	LWIA 13	CITY OF MEMPHIS	April 1, 2005 to June 30, 2007	\$3,062,065.50	Medium
390	06-13-PY5-413-DSLWK	LWIA 13	CITY OF MEMPHIS	July 1, 2005-June 30, 2007	\$391,942.00	Medium
391	06-13-WS6-H13-HKRCI	LWIA 13	CITY OF MEMPHIS	October 12, 2005-Dec. 31, 2006	\$200,000.00	Medium
392	06-13-PY5-1IW-STATE	LWIA 13	CITY OF MEMPHIS	October 5, 2005-June 30, 2006	\$33,000.00	Medium
393	06-13-PY5-2IW-STATE	LWIA 13	CITY OF MEMPHIS	October 17, 2005-June 30, 2006	\$54,324.00	Medium
394	06-13-FY6-N13-NTLEG	LWIA 13	CITY OF MEMPHIS	October 1, 2005-Sep.30, 2006	\$120,000.00	Medium
395						
396	TN DEPT. OF EDU.					
397						
398	04-16-PY3-516-NCNTV		Department of Education	July 1, 2004 to June 30, 2006	\$210,517.31	Medium
399	05-16-PY4-516-NCNTV		Department of Education	July 1, 2005 to June 30, 2007	\$245,518.34	Medium
400	06-16-PY5-216-STATE		Department of Education	Dec. 1, 2005-Sept. 30, 2006	\$39,694.00	Medium
401	06-16-PY5-916-STATE		Department of Education	July 1, 2005 to June 30, 2006	\$422,500.00	Medium
402						
403	AFL-CIO-LC					
404						
405	05-17-FY5-617-RSPNC		TN AFL-CIO-LC	July 1, 2005 to June 30, 2006	\$503,469.00	Medium
406	06-17-FY6-617-RSPNC		TN AFL-CIO-LC	July 1, 2006 to June 30, 2007	\$575,882.00	Medium
407						
408	The University of Memphis					
409						
410	07-18-PY6-918-STATE		THE UNIVERSITY OF MEMPHIS	July 1, 2006 to June 30, 2007	\$587,880.00	Medium
411	04-18-PY3-518-NCNTV		THE UNIVERSITY OF MEMPHIS	March 17, 2006-May 31, 2006	\$9,862.00	Medium
412	06-18-PY5-918-STATE		THE UNIVERSITY OF MEMPHIS	July 1, 2005 to June 30, 2006	\$416,457.00	Medium
413						
414	Miscellaneous					
415						
416	04-15-PY3-515-NCNTV		TN Board of Regents	July 1, 2004 to June 30, 2006	\$19,752.00	Medium
417	05-15-PY4-515-NCNTV		TN Board of Regents	July 1, 2005 to June 30, 2007	\$22,509.00	Medium
418	04-55-FY4-1DW-RSPNC		Lawrence County AE	May 1, 2005-June 30, 2006	\$60,324.00	Medium
419	04-55-PY3-1DW-RSPNC		Lawrence County AE	May 1, 2005-June 30, 2006	\$0.00	Medium
420	05-56-PY4-1AD-NCNTV		Middle TN State University	April1, 2006-October 31, 2006	\$5,000.00	Medium
421	06-57-FY6-957-STATE		Putnam County Schools	May 10, 2006-Dec. 31, 2006	\$18,688.00	Medium
422	ID-06-08096-00		TN Higher Ed. Comm.	July 1, 2005 to June 30, 2006	\$295,000.00	Medium
423						
424	Prepared by Mahrou Fatheddin for questions, please call @ 741-5288					

	A	B	C	D	E	F	L
1	DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT						
2	QUARTERLY UPDATE ATTACHMENT B						
3	AS OF SEPTEMBER 25, 2006						
4	No.	Contract Number	LWIA	Contractor Name	Grant Contract Term	Maximum Liability	Risk factor
5		LWIA 01					
6							
7	1	07-01-PY6-101-ADMIN	LWIA 01	SULLIVAN COUNTY	April 1, 2006 to June 30, 2008	\$133,095.00	MOD
8	2	07-01-PY6-301-YOUTH	LWIA 01	SULLIVAN COUNTY	April 1, 2006 to June 30, 2008	\$871,784.00	MOD
9	3	07-01-PY6-201-ADULT	LWIA 01	SULLIVAN COUNTY	July 1, 2006-June 30, 2008	\$156,429.00	NEW & MOD
10	4	07-01-PY6-401-DSLWK	LWIA 01	SULLIVAN COUNTY	July 1, 2006-June 30, 2008	\$169,657.00	New
11	5	05-49-FY5-2MN-STATE	LWIA 01	SULLIVAN COUNTY	July 28, 2006-June 30, 2007	\$7,977.00	New
12	6	05-49-FY5-3MN-STATE	LWIA 01	Alliance for Bus.&Training	August 1, 2006-June 30, 2007	\$4,981.00	New
13	7	07-49-PY6-1MN-STATE	LWIA 01	Alliance for Bus.&Training	August 17, 2006-June 30, 2007	\$7,041.00	New
14	8	07-49-PY6-1IW-RSPNC	LWIA 01	Alliance for Bus.&Training	July 28, 2006-June 30, 2007	\$79,773.00	New
15	9	07-49-PY6-2IW-RSPNC	LWIA 01	Alliance for Bus.&Training	August 1, 2006-June 30, 2007	\$49,815.00	New
16	10	07-49-PY6-3IW-RSPNC	LWIA 01	Alliance for Bus.&Training	August 17, 2006-June 30, 2007	\$70,413.00	New
17	11	07-49-PY6-D49-WIDPN	LWIA 01	Alliance for Bus.&Training	July 1, 2006-June 30, 2008	\$110,000.00	New
18							
19		LWIA 02					
20							
21	12	05-02-PY4-302-YOUTH	LWIA 02	HAWKINS COUNTY	April 1, 2004-June 30, 2006	\$1,192,035.83	MOD
22	13	07-02-PY6-302-YOUTH	LWIA 02	HAWKINS COUNTY	April 1, 2006 to June 30, 2008	\$1,059,948.00	New
23	14	07-02-PY6-102-ADMIN	LWIA 02	HAWKINS COUNTY	April 1, 2006 to June 30, 2008	\$173,887.00	NEW & MOD
24	15	07-02-PY6-202-ADULT	LWIA 02	HAWKINS COUNTY	July 1, 2006-June 30, 2008	\$179,539.00	New
25	16	07-02-PY6-402-DSLWK	LWIA 02	HAWKINS COUNTY	July 1, 2006-June 30, 2008	\$325,515.00	New
26	17	07-41-PY6-D41-WIDPN	LWIA 02	Walters State Comm. College	July 1, 2006-June 30, 2008	\$110,000.00	New
27							
28		LWIA 03					
29							
30	18	07-03-PY6-103-ADMIN	LWIA 03	KNOX COUNTY	April 1, 2006 to June 30, 2008	\$88,025.00	NEW & MOD
31	19	07-03-PY6-303-YOUTH	LWIA 03	KNOX COUNTY	April 1, 2006 to June 30, 2008	\$470,722.00	NEW
32	20	07-03-PY6-203-ADULT	LWIA 03	KNOX COUNTY	July 1, 2006-June 30, 2008	\$94,497.00	NEW
33	21	07-03-PY6-403-DSLWK	LWIA 03	KNOX COUNTY	July 1, 2006-June 30, 2008	\$227,024.00	NEW
34	22	06-42-FY6-N42-NTLEG	LWIA 03	Knox.-Knox Community Action	October 1, 2005-Sep. 30, 2006	\$73,375.00	MOD
35							
36		LWIA 04					
37							
38	23	07-04-PY6-104-ADMIN	LWIA 04	ROANE COUNTY	April 1, 2006 to June 30, 2008	\$131,059.00	MOD
39	24	07-04-PY6-204-ADULT	LWIA 04	ROANE COUNTY	July 1, 2006-June 30, 2008	\$142,142.00	NEW
40	25	07-04-PY6-404-DSLWK	LWIA 04	ROANE COUNTY	July 1, 2006-June 30, 2008	\$205,405.00	NEW

	A	B	C	D	E	F	L
41	26	05-39-FY5-1FT-STATE	LWIA 04	East TN H. R. A.	July 1, 2006-Sept. 30, 2006	\$1,238.00	New
42	27	07-39-PY6-2MN-STATE	LWIA 04	East TN H. R.A.	August 9, 2006-June, 30, 2007	\$6,159.00	New
43	28	07-39-PY6-D39-WIDPN	LWIA 04	East TN H. R.A.	July 1, 2006-June 30, 2008	\$110,000.00	New
44	29	07-39-PY6-1IW-RSPNC	LWIA 04	East TN H. R.A.	August 9, 2006-June, 30, 2007	\$61,590.00	New
45							
46		LWIA 05					
47							
48	30	07-05-PY6-105-ADMIN	LWIA 05	HAMILTON COUNTY	April 1, 2006 to June 30, 2008	\$211,569.00	MOD
49	31	07-05-PY6-305-YOUTH	LWIA 05	HAMILTON COUNTY	April 1, 2006 to June 30, 2008	\$1,322,742.00	MOD
50	32	07-05-PY6-205-ADULT	LWIA 05	HAMILTON COUNTY	July 1, 2006-June 30, 2008	\$223,770.00	NEW & MOD
51	33	07-05-PY6-405-DSLWK	LWIA 05	HAMILTON COUNTY	July 1, 2006-June 30, 2008	\$357,615.00	New
52	34	04-52-FY4-1AD-STATE	LWIA 05	S/E TN Develop.District	May 17, 2005-May 17, 2006	\$22,649.81	MOD
53	35	05-52-FY5-1MN-STATE	LWIA 05	S/E TN Develop.District	July 17, 2006 to June 30, 2007	\$5,000.00	New
54	36	05-52-FY5-2MN-STATE	LWIA 05	S/E TN Develop.District	July 27, 2006-June 30, 2007	\$5,000.00	New
55	37	05-52-FY5-3MN-STATE	LWIA 05	S/E TN Develop.District	August 1, 2006-June 30, 2007	\$5,000.00	New
56	38	05-52-FY5-4IW-STATE	LWIA 05	S/E TN Develop.District	August 17, 2006-June 30, 2007	\$52,560.00	New
57	39	05-52-FY5-5IW-STATE	LWIA 05	S/E TN Develop.District	Sep. 1, 2006-March 30, 2007	\$33,000.00	New
58	40	06-52-FY6-1IW-STATE	LWIA 05	S/E TN Develop.District	July 6, 2006-June 30, 2007	\$2,440.00	New
59	41	07-52-PY6-D52-WIDPN	LWIA 05	S/E TN Develop.District	July 1, 2006-June 30, 2008	\$110,000.00	New
60	42	07-52-PY6-1AD-STATE	LWIA 05	S/E TN Develop.District	July 18, 2006-December 31, 2006	\$27,350.00	New
61	43	07-52-PY6-1IW-RSPNC	LWIA 05	S/E TN Develop.District	July 17, 2006-June 30, 2007	\$50,000.00	New
62	44	07-52-PY6-2IW-RSPNC	LWIA 05	S/E TN Develop.District	July 27, 2006-June 30, 2007	\$50,000.00	New
63	45	07-52-PY6-3IW-RSPNC	LWIA 05	S/E TN Develop.District	August 1, 2006-June 30, 2007	\$50,000.00	New
64							
65		LWIA 06					
66							
67	46	07-06-PY6-106-ADMIN	LWIA 06	GRUNDY COUNTY	April 1, 2006 to June 30, 2008	\$101,496.00	Mod
68	47	07-06-PY6-306-YOUTH	LWIA 06	GRUNDY COUNTY	April 1, 2006 to June 30, 2008	\$524,533.00	Mod
69	48	07-06-PY6-206-ADULT	LWIA 06	GRUNDY COUNTY	July 1, 2006 to June 30, 2008	\$181,966.00	NEW & MOD
70	49	07-06-PY6-406-DSLWK	LWIA 06	GRUNDY COUNTY	July 1, 2006 to June 30, 2008	\$206,977.00	NEW & MOD
71	50	05-43-FY5-2MN-STATE	LWIA 06	Workforce Solutions	July 17, 2006-June 30, 2007	\$5,000.00	New
72	51	06-43-FY6-2IW-STATE	LWIA 06	Workforce Solutions	July 6, 2006-June 30, 2007	\$55,000.00	New
73	52	07-43-PY6-1IW-STATE	LWIA 06	Workforce Solutions	August 24, 2006-June 30, 2007	\$53,281.00	New
74	53	07-43-PY6-D43-WIDPN	LWIA 06	Workforce Solutions	July 1, 2006-June 30, 2008	\$110,000.00	New
75	54	07-43-PY6-1IW-RSPNC	LWIA 06	Workforce Solutions	July 17, 2006-June 30, 2007	\$50,000.00	New
76							
77		LWIA 07					
78							
79	55	07-07-PY6-107-ADMIN	LWIA 07	PUTNAM COUNTY	April 1, 2006 to June 30, 2008	\$112,698.00	MOD
80	56	07-07-PY6-307-YOUTH	LWIA 07	PUTNAM COUNTY	April 1, 2006 to June 30, 2008	\$629,333.00	MOD
81	57	07-07-PY6-207-ADULT	LWIA 07	PUTNAM COUNTY	July 1, 2006 to June 30, 2008	\$112,128.00	New
82	58	07-07-PY6-407-DSLWK	LWIA 07	PUTNAM COUNTY	July 1, 2006 to June 30, 2008	\$272,743.00	New
83	59	05-40-FY5-4FT-STATE	LWIA 07	Upper Cumberland H.R.A.	Sep.1, 2005-June 30, 2006	\$0.00	MOD

	A	B	C	D	E	F	L
84	60	05-40-FY5-5SS-STATE	LWIA 07	Upper Cumberland H.R.A.	October 1, 2005-June 30, 2007	\$144,670.00	MOD
85	61	05-40-FY5-6AD-STATE	LWIA 07	Upper Cumberland H.R.A.	July 1, 2006-June 30, 2007	\$75,000.00	New
86	62	05-40-FY5-7FT-STATE	LWIA 07	Upper Cumberland H.R.A.	August 1, 2006-December 31, 2006	\$33,000.00	New
87	63	05-40-FY5-8MN-STATE	LWIA 07	Upper Cumberland H.R.A.	July 27, 2006-June 30, 2007	\$18,515.00	New
88	64	07-40-PY6-1IW-RSPNC	LWIA 07	Upper Cumberland H.R.A.	July 27, 2006-June 30, 2007	\$185,151.00	New
89	65	07-40-PY6-D40-WIDPN	LWIA 07	Upper Cumberland H.R.A.	July 1, 2006-June 30, 2008	\$110,000.00	New
90							
91		LWIA 08					
92							
93	66	07-08-PY6-108-ADMIN	LWIA 08	HUMPHREYS COUNTY	April 1, 2006 to June 30, 2008	\$151,275.00	NEW & MOD
94	67	07-08-PY6-308-YOUTH	LWIA 08	HUMPHREYS COUNTY	April 1, 2006 to June 30, 2008	\$973,150.00	NEW & MOD
95	68	07-08-PY6-208-ADULT	LWIA 08	HUMPHREYS COUNTY	July 1, 2006-June 30, 2008	\$160,828.00	NEW & MOD
96	69	07-08-PY6-408-DSLWK	LWIA 08	HUMPHREYS COUNTY	July 1, 2006-June 30, 2008	\$227,511.00	NEW
97	70	03-08-FY3-N08-NTLEG	LWIA 08	Workforce Essentials,Inc.	April 30, 2003 to June 30, 2007	\$4,649,633.00	NEW & MOD
98	71	05-48-FY5-3MN-STATE	LWIA 08	Workforce Essentials,Inc.	July 17, 2006-June 30, 2007	\$14,033.00	New
99	72	05-48-FY5-4FT-STATE	LWIA 08	Workforce Essentials,Inc.	August 1, 2006-December 31, 2006	\$13,552.00	New
100	73	05-48-FY5-5MN-STATE	LWIA 08	Workforce Essentials,Inc.	August 3, 2006-June 30, 2007	\$5,002.00	New
101	74	06-48-FY6-1FT-STATE	LWIA 08	Workforce Essentials,Inc.	Jan.18, 2006-December 31, 2006	\$550,000.00	MOD
102	75	06-48-FY6-4IW-STATE	LWIA 08	Workforce Essentials,Inc.	July 5, 2006-June 30, 2007	\$23,190.00	New
103	76	07-48-PY6-D48-WIDPN	LWIA 08	Workforce Essentials,Inc.	July 1, 2006-June 30, 2008	\$110,000.00	New
104	77	07-48-PY6-1IW-RSPNC	LWIA 08	Workforce Essentials,Inc.	July 17, 2006-June 30, 2007	\$140,328.00	New
105	78	07-48-PY6-2IW-RSPNC	LWIA 08	Workforce Essentials,Inc.	August 3, 2006-June 30, 2007	\$50,020.00	New
106							
107		LWIA 09					
108							
109	79	07-09-PY6-109-ADMIN	LWIA 09	METRO NASHVILLE & DAVIDSON	April 1, 2006 to June 30, 2008	\$212,527.00	NEW & MOD
110	80	07-09-PY6-309-YOUTH	LWIA 09	METRO NASHVILLE & DAVIDSON	April 1, 2006 to June 30, 2008	\$1,158,793.00	NEW
111	81	07-09-PY6-209-ADULT	LWIA 09	METRO NASHVILLE & DAVIDSON	July 1, 2006-June 30, 2008	\$206,932.00	NEW
112	82	07-09-PY6-409-DSLWK	LWIA 09	METRO NASHVILLE & DAVIDSON	July 1, 2006-June 30, 2008	\$547,029.00	NEW
113	83	06-09-FY6-2FT-STATE	LWIA 09	METRO NASHVILLE & DAVIDSON	July 1, 2006-June 30, 2007	\$100,320.00	New
114	84	06-09-FY6-3IW-STATE	LWIA 09	METRO NASHVILLE & DAVIDSON	July 1, 2006-June 30, 2007	\$165,000.00	New
115	85	07-09-PY6-D09-WIDPN	LWIA 09	METRO NASHVILLE & DAVIDSON	July 1, 2006-June 30, 2008	\$110,000.00	New
116							
117		LWIA 10					
118							
119	86	06-10-PY5-310-YOUTH	LWIA 10	HICKMAN COUNTY	April 1, 2005 to June 30, 2007	\$846,631.80	MOD
120	87	07-10-PY6-110-ADMIN	LWIA 10	HICKMAN COUNTY	April 1, 2006 to June 30, 2008	\$134,982.00	MOD
121	88	07-10-PY6-310-YOUTH	LWIA 10	HICKMAN COUNTY	April 1, 2006 to June 30, 2008	\$770,958.00	MOD
122	89	07-10-PY6-210-ADULT	LWIA 10	HICKMAN COUNTY	July 1, 2006 to June 30, 2008	\$128,964.00	NEW & MOD
123	90	07-10-PY6-410-DSLWK	LWIA 10	HICKMAN COUNTY	July 1, 2006 to June 30, 2008	\$314,932.00	NEW
124	91	04-53-FY4-5IW-STATE	LWIA 10	S. C.TN Workforce Alliance	January 27, 2006-June 30, 2006	\$11,880.00	MOD
125	92	05-53-FY5-3IW-STATE	LWIA 10	S. C.TN Workforce Alliance	Sep.6, 2005- June 30, 2006	\$98,396.41	MOD
126	93	05-53-FY5-4DW-STATE	LWIA 10	S. C.TN Workforce Alliance	July 17, 2006-June 30, 2007	\$16,500.00	New

Employment Eligibility Verification

INSTRUCTIONS

PLEASE READ ALL INSTRUCTIONS CAREFULLY BEFORE COMPLETING THIS FORM.

Anti-Discrimination Notice. It is illegal to discriminate against any individual (other than an alien not authorized to work in the U.S.) in hiring, discharging, or recruiting or referring for a fee because of that individual's national origin or citizenship status. It is illegal to discriminate against work eligible individuals. Employers **CANNOT** specify which document(s) they will accept from an employee. The refusal to hire an individual because of a future expiration date may also constitute illegal discrimination.

Section 1 - Employee. All employees, citizens and noncitizens, hired after November 6, 1986, must complete Section 1 of this form at the time of hire, which is the actual beginning of employment. **The employer is responsible for ensuring that Section 1 is timely and properly completed.**

Preparer/Translator Certification. The Preparer/Translator Certification must be completed if Section 1 is prepared by a person other than the employee. A preparer/translator may be used only when the employee is unable to complete Section 1 on his/her own. However, the employee must still sign Section 1 personally.

Section 2 - Employer. For the purpose of completing this form, the term "employer" includes those recruiters and referrers for a fee who are agricultural associations, agricultural employers or farm labor contractors.

Employers must complete Section 2 by examining evidence of identity and employment eligibility within three (3) business days of the date employment begins. If employees are authorized to work, but are unable to present the required document(s) within three business days, they must present a receipt for the application of the document(s) within three business days and the actual document(s) within ninety (90) days. However, if employers hire individuals for a duration of less than three business days, Section 2 must be completed at the time employment begins. **Employers must record: 1) document title; 2) issuing authority; 3) document number, 4) expiration date, if any; and 5) the date employment begins.** Employers must sign and date the certification. Employees must present original documents. Employers may, but are not required to, photocopy the document(s) presented. These photocopies may only be used for the verification process and must be retained with the I-9. **However, employers are still responsible for completing the I-9.**

Section 3 - Updating and Reverification. Employers must complete Section 3 when updating and/or reverifying the I-9. Employers must reverify employment eligibility of their employees on or before the expiration date recorded in Section 1. Employers **CANNOT** specify which document(s) they will accept from an employee.

- If an employee's name has changed at the time this form is being updated/reverified, complete Block A.
- If an employee is rehired within three (3) years of the date this form was originally completed and the employee is still eligible to be employed on the same basis as previously indicated on this form (updating), complete Block B and the signature block.
- If an employee is rehired within three (3) years of the date this form was originally completed and the employee's work authorization has expired **or** if a current employee's work authorization is about to expire (reverification), complete Block B and:

- examine any document that reflects that the employee is authorized to work in the U.S. (see List A **or** C),
- record the document title, document number and expiration date (if any) in Block C, and
- complete the signature block.

Photocopying and Retaining Form I-9. A blank I-9 may be reproduced, provided both sides are copied. The Instructions must be available to all employees completing this form. Employers must retain completed I-9s for three (3) years after the date of hire or one (1) year after the date employment ends, whichever is later.

For more detailed information, you may refer to the Department of Homeland Security (DHS) Handbook for Employers, (Form M-274). You may obtain the handbook at your local U.S. Citizenship and Immigration Services (USCIS) office.

Privacy Act Notice. The authority for collecting this information is the Immigration Reform and Control Act of 1986, Pub. L. 99-603 (8 USC 1324a).

This information is for employers to verify the eligibility of individuals for employment to preclude the unlawful hiring, or recruiting or referring for a fee, of aliens who are not authorized to work in the United States.

This information will be used by employers as a record of their basis for determining eligibility of an employee to work in the United States. The form will be kept by the employer and made available for inspection by officials of the U.S. Immigration and Customs Enforcement, Department of Labor and Office of Special Counsel for Immigration Related Unfair Employment Practices.

Submission of the information required in this form is voluntary. However, an individual may not begin employment unless this form is completed, since employers are subject to civil or criminal penalties if they do not comply with the Immigration Reform and Control Act of 1986.

Reporting Burden. We try to create forms and instructions that are accurate, can be easily understood and which impose the least possible burden on you to provide us with information. Often this is difficult because some immigration laws are very complex. Accordingly, the reporting burden for this collection of information is computed as follows: **1) learning about this form, 5 minutes; 2) completing the form, 5 minutes; and 3) assembling and filing (recordkeeping) the form, 5 minutes, for an average of 15 minutes per response.** If you have comments regarding the accuracy of this burden estimate, or suggestions for making this form simpler, you can write to U.S. Citizenship and Immigration Services, Regulatory Management Division, 111 Massachusetts Avenue, N.W., Washington, DC 20529. OMB No. 1615-0047.

NOTE: This is the 1991 edition of the Form I-9 that has been rebranded with a current printing date to reflect the recent transition from the INS to DHS and its components.

Employment Eligibility Verification

Please read instructions carefully before completing this form. The instructions must be available during completion of this form. **ANTI-DISCRIMINATION NOTICE:** It is illegal to discriminate against work eligible individuals. Employers **CANNOT** specify which document(s) they will accept from an employee. The refusal to hire an individual because of a future expiration date may also constitute illegal discrimination.

Section 1. Employee Information and Verification.

 To be completed and signed by employee at the time employment begins.

Print Name: Last	First	Middle Initial	Maiden Name
Address (Street Name and Number)		Apt. #	Date of Birth (month/day/year)
City	State	Zip Code	Social Security #
I am aware that federal law provides for imprisonment and/or fines for false statements or use of false documents in connection with the completion of this form.		I attest, under penalty of perjury, that I am (check one of the following):	
		<input type="checkbox"/> A citizen or national of the United States <input type="checkbox"/> A Lawful Permanent Resident (Alien #) A _____ <input type="checkbox"/> An alien authorized to work until _____ (Alien # or Admission #) _____	
Employee's Signature			Date (month/day/year)

Preparer and/or Translator Certification. (To be completed and signed if Section 1 is prepared by a person other than the employee.) I attest, under penalty of perjury, that I have assisted in the completion of this form and that to the best of my knowledge the information is true and correct.

Preparer's/Translator's Signature	Print Name
Address (Street Name and Number, City, State, Zip Code)	
Date (month/day/year)	

Section 2. Employer Review and Verification.

 To be completed and signed by employer. Examine one document from List A OR examine one document from List B and one from List C, as listed on the reverse of this form, and record the title, number and expiration date, if any, of the document(s).

List A	OR	List B	AND	List C
Document title: _____		_____		_____
Issuing authority: _____		_____		_____
Document #: _____		_____		_____
Expiration Date (if any): _____		_____		_____
Document #: _____		_____		_____
Expiration Date (if any): _____		_____		_____

CERTIFICATION - I attest, under penalty of perjury, that I have examined the document(s) presented by the above-named employee, that the above-listed document(s) appear to be genuine and to relate to the employee named, that the employee began employment on (month/day/year) _____ and that to the best of my knowledge the employee is eligible to work in the United States. (State employment agencies may omit the date the employee began employment.)

Signature of Employer or Authorized Representative	Print Name	Title
Business or Organization Name	Address (Street Name and Number, City, State, Zip Code)	Date (month/day/year)

Section 3. Updating and Reverification.

 To be completed and signed by employer.

A. New Name (if applicable)	B. Date of rehire (month/day/year) (if applicable)
C. If employee's previous grant of work authorization has expired, provide the information below for the document that establishes current employment eligibility.	
Document Title: _____ Document #: _____ Expiration Date (if any): _____	
I attest, under penalty of perjury, that to the best of my knowledge, this employee is eligible to work in the United States, and if the employee presented document(s), the document(s) I have examined appear to be genuine and to relate to the individual.	
Signature of Employer or Authorized Representative	Date (month/day/year)

LISTS OF ACCEPTABLE DOCUMENTS

LIST A		LIST B		LIST C
Documents that Establish Both Identity and Employment Eligibility	OR	Documents that Establish Identity	AND	Documents that Establish Employment Eligibility
1. U.S. Passport (unexpired or expired)		1. Driver's license or ID card issued by a state or outlying possession of the United States provided it contains a photograph or information such as name, date of birth, gender, height, eye color and address		1. U.S. social security card issued by the Social Security Administration (<i>other than a card stating it is not valid for employment</i>)
2. Certificate of U.S. Citizenship (<i>Form N-560 or N-561</i>)		2. ID card issued by federal, state or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color and address		2. Certification of Birth Abroad issued by the Department of State (<i>Form FS-545 or Form DS-1350</i>)
3. Certificate of Naturalization (<i>Form N-550 or N-570</i>)		3. School ID card with a photograph		3. Original or certified copy of a birth certificate issued by a state, county, municipal authority or outlying possession of the United States bearing an official seal
4. Unexpired foreign passport, with <i>I-551 stamp</i> or attached <i>Form I-94</i> indicating unexpired employment authorization		4. Voter's registration card		4. Native American tribal document
5. Permanent Resident Card or Alien Registration Receipt Card with photograph (<i>Form I-151 or I-551</i>)		5. U.S. Military card or draft record		5. U.S. Citizen ID Card (<i>Form I-197</i>)
6. Unexpired Temporary Resident Card (<i>Form I-688</i>)		6. Military dependent's ID card		6. ID Card for use of Resident Citizen in the United States (<i>Form I-179</i>)
7. Unexpired Employment Authorization Card (<i>Form I-688A</i>)		7. U.S. Coast Guard Merchant Mariner Card		7. Unexpired employment authorization document issued by DHS (<i>other than those listed under List A</i>)
8. Unexpired Reentry Permit (<i>Form I-327</i>)		8. Native American tribal document		
9. Unexpired Refugee Travel Document (<i>Form I-571</i>)		9. Driver's license issued by a Canadian government authority		
10. Unexpired Employment Authorization Document issued by DHS that contains a photograph (<i>Form I-688B</i>)		For persons under age 18 who are unable to present a document listed above:		
		10. School record or report card		
		11. Clinic, doctor or hospital record		
		12. Day-care or nursery school record		

Illustrations of many of these documents appear in Part 8 of the Handbook for Employers (M-274)

11. Appendix A

Tennessee Department of Labor and Workforce Development SCSEP ON-SITE PROGRAM MONITORING GUIDE

Project Name: _____ Program Year: _____

Title V Funding Level: _____

Number of Authorized Title V Slots: _____

Current Title V Enrollment: _____

Date of Visit: _____

Date of Previous Visit: _____

OVERVIEW OF ASSESSMENT

In compliance with Federal requirements, this instrument has been developed for use to assist sub-grantees in carrying out the purposes and provisions of Title V of the Older Americans Act as amended by the Older Americans Act Amendments of 2000 (OAA) and in accordance with the approved subgrant.

The purpose of this instrument is to assess your program. For each on-site monitoring visit, an assessment will be filed in a report with an evaluation of the grant narrative underscoring for key components

1. Title V Regulations Specific Program Operations
2. Title V Regulations Specific Financial Management and Reporting
3. Grant Requirement Administrative Review
4. Training Site Visits

Each of these four components is covered by a series of specific questions that have been designed to assess program adherence, program effectiveness and program efficiency. However, for ease of use, the rest of this document deliberates the pertinent Title V regulations in sequential order.

Section I:

COORDINATION with WORKFORCE INVESTMENT ACT (WIA) REG. 641.200 – 641.240

641.200 SCSEP is a required partner under WIA, is part of the One-Stop Delivery System, and required to follow all applicable rules under WIA and its regulations. (WIA section 121(b)(1)(B)(vi)(29U.S.C.2841(B)(1)(B)(vi)) and the 29 CFR part 662 subpart B(ss662.200 through 662.280))

1. Is the Sub-grantee familiar with the WIA requirements and know how the system works? Yes ____ No ____
2. Does a MOU exist between the sub-grantee and WIA Local Board? Yes ____ No ____
 - a. If yes, does it contain required financial arrangements and in-kind contributions when possible? Yes ____ No ____
 - b. Are applicable SCSEP core services at the comprehensive career center outlined in the MOU? Yes ____ No ____

641.210 SCSEP is required to make arrangements though the One-Stop Delivery System to provide eligible and ineligible individual with access to other activities carried out by WIA partners at the Career Center.

1. Does the sub-grantee distribute Career Center handouts to customers? Yes ____ No ____

641.220 Title V resources are to be used to provide Title V services to Title V eligible individuals. SCSEP is to refer ineligible individuals to the One-Stop Delivery System for services.

1. If a MOU exists, is a referral process identified and described? Yes ____ No ____

641.230 In a MOU, reciprocal arrangements can be negotiated between SCSEP and One-Stop Delivery System to accept each others assessment to determine need for services in SCSEP and Adult Programs under Title IB of WIA.

1. Did the sub-grantee choose to arrange a reciprocal arrangement in a MOU? Yes ____ No ____

641.240 SCSEP eligible participants are not automatically eligible for intensive services under Title I of WIA, local boards may deem SCSEP as satisfying WIA requirements for training services.

1. Did the sub-grantee choose to negotiate such an arrangement in a MOU?
Yes _____ No _____

STATE SENIOR EMPLOYMENT SERVICES COORDINATION PLAN
(the State Plan)
Reg. 641.300 – 641.365

The State Plan is submitted by the governor as an independent document or as part of the WIA Unified Plan. It describes the planning and implementation process for SCSEP services in the State.

1. Does the project have a copy of the latest State Plan?
Yes _____ No _____

Comments:

SERVICES TO PARTICIPANTS
Reg. 641.500 - 615.590

ELIGIBILITY FOR ENROLLMENT IN SCSEP
Reg. 641.500 – 641-510

**With Revised Income Definitions and Income Inclusions and Exclusions for
Determining SCSEP Eligibility**

641.500 States may enter into cross border county enrollment agreements of eligible participants.

641.505 Initial eligibility determined at SCSEP application. Once a SCSEP participant, sub-grantee is responsible for verifying continued income eligibility at least once every 12 months or as circumstances require.

TEGL 13-04
Effective 01/07/05

Revised Policies

- The definition of family now conforms to the WIA definition of family unless the applicant is claimed as a dependent on the federal income tax return of another family member. In that instance, the CPS definition of family is used.
- For applicants 65 years of age or older, only Social Security income minus Medicare deductions will be included for income eligibility determination.
- The look-back period for income eligibility termination will now be the 6 month period prior to application, annualized.

Clarification of Procedures

Program Eligibility

- Eligibility is limited to low-income persons who are 55 years or older and **unemployed** at the time of application as provided at 502(a)(1) of the 2000 Amendments (OAA).
- To be considered a family of one due to disability appropriate medical documentation must be provided and kept on file, even in remote locations.

Includable Income

- Participant eligibility income includes:
 - earnings
 - unemployment compensation
 - Social Security Disability Income (SSDI)
 - veterans' payments
 - survivor benefits
 - pension or retirement income
 - interest
 - dividends
 - rents
 - royalties
 - estates
 - trusts
 - education assistance
 - alimony
 - financial assistance from outside household
 - other income

Participant eligibility income excludes:

- capital gains
- bank deposit withdrawal
- money borrowed
- tax refunds
- gifts
- lump sum inheritances or insurance payments
- SSI
- public assistance payments
- child support
- worker's comp
- money borrowed
- first \$2000 to Indians.

641.510 When the participant is no longer eligible due to an increase in family, income, the participant must be given written notice within 30 days and terminated within 30 days of receipt of notice.

RECRUITMENT OF PARTICIPANTS

Reg. 641.515 - 615.530

641.515 Each grantee or sub-grantee must develop methods of recruitment and selection that assure that the maximum number of eligible individuals will have an opportunity to participate in the program.

SCSEP grantee or sub-grantee must list all community service opportunities with the State Workforce Agency, all appropriate local offices, and must use the One-Stop Delivery System in the recruitment and selection of eligible individuals.

1. Do recruitment and selection procedures reflect the sub-grantee is seeking to enroll:

(a) Minorities? Yes ____ No ____

(b) Indians? Yes ____ No ____

(c) Limited English speaking eligible individuals? Yes ____ No ____

(d) Greatest Economic Need? Yes ____ No ____

2. Does Quarterly Progress Reports indicate equitable participation by all groups noted above? Yes ____ No ____

3. Describe the current method used to fill a vacancy. Does this include notifying state agencies of vacancies?

4. How are participants with the greatest economic need determined?

5. How are participants with the poorest employment prospects identified?
Comments:

641.520 In selecting eligible individuals for SCSEP participation, priority must be given to individuals who are:

- at least 60 years old
- married to veterans or veterans' spouses who died with a service connected disability
- members of active duty, missing in action
- individuals captured in the line of duty
- people detained by foreign governments
- spouses of veterans who are disabled w/ service
- widows of deceased or disabled veterans.

Sub-grantees must apply priorities as follows:

- Veterans and qualified spouses at least 60 year old
- Other individuals at least 60 years old
- Veterans and qualified spouses 55 – 59
- Other individuals aged 55 – 59

641.525 As defined in 641.515.

641.530 In accordance with 641.520, sub-grantees should select qualified individuals.

1. Is there feasible evidence that the sub-grantee is adhering to the priorities and preferences when examining participant characteristics?

Yes _____ No _____

2. Does the project have a waiting list?

Yes _____ No _____

3. What process does the project use in selecting eligible applicants from the waiting list?

4. Do participant files show accurate computation of family income, using the inclusion and exclusion provisions listed in the SCSEP Regulations?

Yes _____ No _____

5. What are the procedures for immediate or 30-day terminations due to incorrect determination of eligibility?

6. If an applicant disagrees with the findings of ineligibility, how are right-of-appeal procedures explained?

7. What referrals or other assistance are provided to those found ineligible? How is it documented?

8. When a participant is terminated for cause, is proper documentation in the file?

Yes ____ No ____

9. How is the recertification done and how is confidentiality maintained?

10. _____
How is the recertification linked to other activities, such as the annual physical examination or the reassessments of goals in the IEPs?

11. Is the Confidential Income Statement used for both application and recertification? Yes _____ No _____
12. Is documentation in the participants' files? Yes _____ No _____
13. Is there an I-9 Employment Eligibility Verification Form on file for each participant enrolled after November 6, 1986? Yes _____ No _____

SERVICES

Reg. 641.535 - 615.590

641.535 When individuals are selected for participation in SCSEP, The grantee or sub-grantee is responsible for providing the following:

1. Orientation to the SCSEP

- information on project goals and objectives
- community service assignments
- training opportunities
- available supportive services
- free physical examinations
- participant responsibilities and rights
- permitted and prohibited political activities

2. Assessment of Participants

- work history
- skills, interests and talents
- physical capabilities and aptitudes
- need for supportive services
- occupational preferences
- training needs
- potential for performing community service assignment
- potential for transition to unsubsidized employment

- as necessary but no less than two times in a twelve month period
- 3. Using the information gathered during the assessment to develop an individual employment plan (IEP), unless already done under title I of WIA, and updating the IEP as necessary to reflect information gathered during the assessments.
- 4. Placing or arranging for necessary training specific in relation to the participants' community service activities in the community in which they reside (or in a nearby community).
- 5. Providing or arranging for necessary training specific to the participants' community service assignments.
- 6. Assisting participants to schedule other training identified in their SCSEP IEPs.
- 7. Assisting participants in arranging for needed supportive services identified in their SCSEP IEPs.
- 8. Providing participants with wages and fringe benefits for time spent at assigned community service employment activity.
- 9. Ensuring participants have safe and healthy working conditions at community service site.
- 10. Verifying participants' income eligibility at least every 12 months.
- 11. Assisting participants to obtain unsubsidized employment and if needed, employment counseling in IEP support.
- 12. Providing appropriate services for participants through the One-Stop delivery System under WIA.
- 13. Providing counseling for participants' goals and progress as identified in IEDPs.
- 14. Providing follow-up service for participants placed in unsubsidized employment during first 6 months to better ensure success rate and determine if further follow-up services are needed.
- 15. Following-up with participants placed in unsubsidized employment during first six months to determine if still employed.
 - Provide service that according to administrative guidelines that may be issued by DOL.
 - Grantees /Sub- Grantees cannot use SCSEP funds to provide only job search assistance or job referral services. May job search assistance, job referral services, job club if participants are enrolled in SCSEP and assigned to a community service assignment.

16. Is orientation provided to new participants at the time of enrollment prior to the first day at a host agency and compensated?

Yes ____ No ____

17. Is orientation provided to host agencies and supervisors? Are written materials provided? Explain?

18. Is a Participant Handbook provided with the following information included?

a. Project's grievance procedure and personnel policies

Yes ____ No ____

b. (b) Participant Enrollment Agreement

Yes ____ No ____

c. Permitted and prohibited political activities

Yes ____ No ____

d. Age Discrimination and Employment Act (ADEA) information

Yes ____ No ____

e. American with Disabilities Act (ADA) information

Yes ____ No ____

f. Drug-Free Workplace Act

Yes ____ No ____

19. In participant's file, is there a copy of the Participant Task Form developed, dated and signed on or before the Participant's first day at host agency?

Yes ____ No ____

20. Does the project assess each new participant to determine the most suitable SCSEP assignment for that individual?

Yes ____ No ____

21. Is the assessment made in consultation with the participant and does it consider the individual's preference of occupational category, work history, skills, aptitudes, and potential for performing proposed community service duties?

Yes ____ No ____

22. Does the assessment consider the potential for transition to unsubsidized employment?

Yes ____ No ____

23. Does the project seek a community service employment assignment which permits the most effective use of each participant's skills and aptitudes?

Yes ____ No ____

24. Does the project evaluate each Participant to determine potential for transition to unsubsidized employment and the appropriateness of participant's current community service employment assignment?

Yes ____ No ____

Does the project develop alternate assignments, whenever feasible, if it is determined that a different community service employment assignment will provide greater opportunity for the use of the participant's skills and aptitudes, providing work experience which will enhance the potential for unsubsidized employment?

Yes ____ No ____

25. Are the assessments and evaluations required by this section documented and part of the participant file?

Yes ____ No ____

26. Is an Individual Employment Plan (IEP) developed within 3 months of enrollment for each participant and does it include the assessment?

Yes ____ No ____

27. Does the project evaluate the progress of participant at least twice a year?

Yes ____ No ____

28. Is the IEP developed in consultation with the participant and is the principle of shared responsibility understood? (Explain)

Yes ____ No ____

29. Are specific goals and completion dates included?

Yes ____ No ____

30. Are progress review dates noted?

Yes ____ No ____

31. Are there signed agreements between participant and project?

Yes ____ No ____

32. Is the original IEP maintained in the participant's file?

Yes ____ No ____

33. Are host agency sites aware of participant's goals and their role in assisting them to accomplish the goals? Yes _____ No _____

(Explain.)

Supervision

1. Are participants receiving daily supervision at training sites? Yes _____ No _____
2. Do supervisors ensure that no participant works more than the compensated number of hours per day? Yes _____ No _____
3. Are participants compensated for extra hours? Yes _____ No _____

PARTICIPANT SUPPORTIVE SERVICES

Reg. 641.545

641.545 The grantee or subgrantee may provide or arrange for support services to assist participants in participating in SCSEP such as paying transportation, health care/medical, job related, i.e.: shoes, badges, uniforms, eyeglasses, tools, child care, adult care, temp shelter, and follow-up services costs. To the extent feasible, the grantee or subgrantee should provide for payment of these expenses from other resources.

1. Are supportive services being provided to assist participants in subsidized and, where appropriate, in unsubsidized employment? Yes _____ No _____
2. Are supportive services obtained at no cost or reduced cost to the program? (Explain arrangement) Yes _____ No _____

3. Are grant funds used to subsidize participant's transportation cost?
Yes _____ No _____
4. Is transportation obtained at no cost
or reduced cost to the program?
(explain arrangement) Yes _____ No _____

TRAINING

Reg. 641.540

641.540 The grantee or subgrantee must arrange skill training that is realistic and consistent w/the participant IEP and that the most effective use of skills and talents. This does not apply to training received as part of community service assignment.

Training may be:

- provided during or after community service activity,
- may be seminars, classroom, instruction, individual instruction, OJT, or other appropriate program such as WIA,
- obtained through OJT is encouraged,

Costs should be shouldered at no cost to SCSEP by other available resources as often as possible,

Essentials such as supplies may be paid by the grantee/sub-grantee. Participants may be paid wages while in training.

Related room and board and travel cost associated may be paid by grantee or sub-grantee and is not prohibited or limited should the participant want to pursue directed training during hours not assigned to community service activities.

1. Is training being provided in job seeking skills in preparation for unsubsidized placement? Yes _____ No _____
- a. If so, is training obtained at no cost or reduced cost, e.g. WIA, Voc Rehab., etc when possible? (Explain arrangement)

2. How is the assessment process used to determine individual participant training/education needs?
- _____
- _____
- _____
3. Does training/education fit into, and has it been made a part of, participants' IEPs? Yes _____ No _____
4. Is host agency community service activities provided, clearly spelled out in participant job description and IDP and not confused with training? Yes _____ No _____
5. How are participant training records kept?
- _____
- _____
- _____
- _____
- _____
6. Have all training/education costs expended during the current year been described in detailed sub-grant work-plan/budget or been approved in writing by the state coordinator? Yes _____ No _____
7. Are participant meetings held quarterly and are they documented? Yes _____ No _____
8. Do these meetings include agendas and sign-in sheets? Yes _____ No _____
9. Are host agency supervisors or other non-participant parties involved? Yes _____ No _____

10. How are training hours tracked? (Explain.)

PLACEMENT INTO UNSUBSIDIZED EMPLOYMENT

Reg. 641.550 – 641.560

641.550 Because one of SCSEP is to foster economic self sufficiency, grantees and sub-grantees should place as many participants as possible into unsubsidized placement in accordance with IEP. For those with an IEP goal of unsubsidized placement, project sponsors will employ reasonable means to place participants into unsubsidized employment. Project sponsors should contact private and public employers directly and through the One Stop Delivery System to develop or identify suitable unsubsidized employment opportunities and should encourage host agencies to employ participants in their regular work forces

641.555 For participants placed in unsubsidized employment, the grantee must make contact during first 6 months to determine if support services are needed to remain in the job.

Grantee must contact participant 6 months after placement to determine if they have been retained by employer or grantee may use wage records to verify continued employment.

Other follow-up may be required by Department.

641.560 Grantees are encouraged to work with the most difficult to place and refer job ready individuals to the Career Center.

Unsubsidized Placements

- a. The unsubsidized placement goal of the number of authorized slots for this grant period is approximately what percentage? _____
- b. What was the date at the end of the last quarter? _____
- c. What was the target goal number at the end of last quarter? _____

d. Does it appear that the placement goal will be achieved by the end of the grant period? Yes _____ No _____

e. What actions are being taken to correct deficiency in meeting goal, if applicable? (Describe).

f. Was the unsubsidized placement goal met last year? Yes _____ No _____

Private/Public Sector Placement

1. Have linkages been established with private sector employers? Yes _____ No _____
2. Have linkages been established with public sector employers? Yes _____ No _____
3. Are private and public sector employers contacted directly to identify and develop suitable job openings? Yes _____ No _____

4. List major employers that have been contacted within the past program year?

5. How is job development currently being conducted? (Explain.)

6. Have Job Fairs/Job Clubs been used to assist in meeting placement goal?
Yes _____ No _____
7. Is job search assistance being provided to participants?
Yes _____ No _____
8. Is follow-up being conducted with the participant within the first 6 months to determine if support services are needed to maintain employment?
Yes _____ No _____
9. Is follow-up being conducted with the participant within been retained by employer or grantee may use wage records to verify continued employment?
Yes _____ No _____
- a. Does follow-up conform to project's operational plan?
Yes _____ No _____

PARTICIPANT WAGES AND FRINGE BENEFITS

641.565 Participants' wages are based on the highest applicable minimum wage for time spent in orientation, training, and work in community service assignments.

Allowable fringe benefit costs: grantee mat provide fringe benefits: annual leave, sick leave, holidays, health insurance, social security, and others approved by grant contract.

Grantees may not pay retirement with grant funds.

Unless required by local laws, grantees may not pay costs of employment insurance for participants.

Participants are to receive all fringe benefits required by law.

- a. Grantees provide fringe benefits uniformly to all participants within a project or subproject.
- b. Grantees must offer participants the opportunity to receive physical exams annually.
- c. Physical are a fringe benefit not an eligibility criterion.

d. Physical examination

Each participant should be offered the opportunity to take a physical examination annually. A physical is a fringe benefit, and is not an eligibility criterion. The examining physician shall provide, to the participant only, a written report of the results of the examination. The participant may, at his or her option, provide the grantee or sub-grantee a copy of the report. The results of the physical examination will not be taken into consideration in determining placement into a community service assignment.

- e. A participant may refuse the physical examination offered. In such a case, the grantee or sub-grantee should document this refusal, through a signed waiver or other means, within 60 work days after commencement of the community service assignment. Thereafter, grantees or sub-grantees will document participants' refusal of the annual physical examination.

1. Are initial physical examinations offered to each participant?
Yes ____ No ____
2. Are additional physical examinations offered at least once a year or before 15 continuous months?
Yes ____ No ____
3. Are physical examinations obtained at no cost to the project whenever possible?
(Explain arrangement.) Yes ____ No ____

4. Workers Compensation being paid? Yes ____ No ____

5. If applicable, describe retirement.

MAXIMUM DURATION OF PARTICIPANT

Reg. 641.570 -- 641.575

641.570 A maximum duration of enrollment may be established in the grant agreement when authorized by the Department. Time limits on participants will be reasonable and IEPs will provide for transition to unsubsidized employment or other assistance before the maximum enrollment duration has expired.

1. Has maximum duration of enrollment been established?

Yes _____ No _____

2. If so, was it approved in the grant agreement?

Yes _____ No _____

641.575 A grantee may establish a limit on the amount of time its participants may spend at each agency. Such limits should be established in the grant agreement and reflected in IEP.

1. Has a limit on the amount of time at each agency been established?

Yes _____ No _____

2. If so, was it approved in the grant agreement?

Yes _____ No _____

PERFORMANCE ACCOUNTABILITY

Reg. 641.710 – 641.730

Although the proposed Program Year 2004 Tennessee Performance rates may be considered practice, it is important that the experience prove worth while and provide Tennessee with the capacity to meet the formal performance standards when they are established.

PERFORMANCE MEASURES FOR PROGRAM YEAR 2004. Tennessee will be held accountable for seven performance measures mandated by the OAA Amendments for PY 2004 and the implementing regulations. These are:

- Placement Rate
- Service Level
- Service to Most-in-Need
- Community Service Provided
- Employment Retention
- Customer Satisfaction for Employers, Participants, and Host Agencies
- Earnings Increase

Descriptions of the performance measures follow:

1. Placement Rate

The Placement Rate will be calculated by dividing the number of SCSEP participants placed in unsubsidized employment by the number of each grantee's authorized community service positions. Consistent with the OAA Amendments, placement may be in either full. or part-time employment. A placement requires 30 days of employment, not necessarily continuous, With one or more employers within the first 90 days of exit. Each day that a participant is on the payroll of an employer counts towards the 30-day

requirement, regardless of whether the participant actually performs services on that day. Thus a participant who exits SCSEP for unsubsidized employment on September 1 and remains employed with the same employer through September 30 has achieved a placement.

Historically, the goal of SCSEP grantees has been to achieve a 20 percent Placement Rate. Beginning in PY 2004, Section 513(a)(2)(C) of the OAA Amendments requires the Employment and Training Administration (ETA) to establish a formal performance measure of *not less than 20 percent* placement.

2. Service Level

The Service Level is defined as the number of a grantee's participants divided by the number of the grantee's authorized positions. The Department will maintain the current program requirement for state and national grantees to serve a total number of eligible individuals that is at least 140 percent of the number of authorized community service positions - this is comparable to the GPRA goal for the program. In addition to this measure's legislative basis in section 513(b)(1) of the OAA Amendments, the ability to serve greater numbers of eligible participants is cited in section 514(c)(1) as a criterion to obtain a competitive SCSEP grant.

3. Service to the Most-in-Need

a. Persons who are "most-in-need" are defined in section 641.710 as those who have:

- an income level at or below the poverty line; (OAA sec. 101(27))
- physical and mental disabilities
- poor employment history or prospects
- aged (over the age of 60)
- language barriers
- cultural, social, or geographical isolation
 - isolation caused by racial or ethnic status
 - restricting the ability of the individual to perform normal daily tasks,
 - threatens the capacity of the individual to live independently; or (OAA sec. 101(28))

The Department has determined that Service to Most-in-Need will reflect the percentage of total participants who are at least 60 years old and who meet at least one additional criterion from the following: an income at or below the poverty level; physical or mental disabilities; language barriers (LEP or literacy); cultural social or geographical isolation; poor employment history or prospects (for example, displaced homemakers); or other social barriers. This goal is **not sanctionable** for Program Year 2004. *For Program Year 2004 Tennessee's target for serving those most in need will be 70% of all participants.*

1. Community Service

In addition to the goal of placement in unsubsidized employment an equally important goal of the Title V program is to benefit communities through community service assignments. The Community Service measure provides a tracking method with respect to accomplishments in meeting the community benefit goal.

The Department decided to measure Community Service by obtaining information on the number of hours of community service provided. The goal is defined as the total number of community service hours worked by all participants will be compared to the grantee's community service goal expressed in hours. *For Program Year 2004 Tennessee's target for community service hours is 237,500 (Approximately, 950 hours per authorized position.) There are 250 authorized positions. This goal is **not sanctionable** for Program Year 2004.*

2. Retention Rate

Section 513(b)(3) of the OAA Amendments requires performance indicators to include "placement into and retention in unsubsidized public or private employment." The Department decided to treat these two outcomes separately. The OAA Amendments define "retention in public or private unsubsidized employment" in section 5 13 (c) (2) (B) as: "full- or part-time paid employment in the public or private sector by an participant under this title for 6 months after the starting date of placement into unsubsidized employment without the use of funds under this title or any other Federal or state employment subsidy program." The Department plans to measure retention at six months by determining which participants who have been placed into unsubsidized employment are employed by any employer on the 180th day after first starting unsubsidized employment with any employer.

For PY 2003, Tennessee demonstrated 62% of the participants placed were working at 180 days. However given the new eligibility standards and the vast learning curve, Tennessee asks for a retention goal of 50 % of the qualified placements shall be employed at 180 days for this PY 04.

3. Customer Satisfaction for Employers, Participants, and Host Agencies

Section 513(b)(4) of the OAA Amendments states that indicators of SCSEP performance must include satisfaction of the participants, employers, and host agencies with their experience with SCSEP. The Department interprets this provision as requiring three separate and distinct measures of Customer Satisfaction - a customer satisfaction measure for participants, a measure for employers, and a measure for host agencies.

The samples will be large enough to collect statistically valid results for each State grantee and for each national grantee organization. For the employer customer satisfaction survey, the Department's goal is to have sub-grantees deliver a survey form to every employer at a mandatory follow-up interview within 90 days after a placement.

Grantees will be responsible for distributing written survey instruments and using a methodology established by the Department to ensure uniformity. For all three surveys, the targeted return rate is 70%. Grantees are instructed to deliver as many as three surveys in order to reach the 70% mark. The completed surveys will be sent to a central collection point for collation and analysis by a contractor selected by the Department.

Beginning in PY 2004, Customer Satisfaction for all three groups will be surveyed using the American Customer Satisfaction Index (ACSI). The ACSI will allow SCSEP to look at its own performance and also to benchmark its performance against other entities within and outside of the employment and training system. The ACSI also has a history of usefulness in tracking change over time, making it an ideal way to gauge progress in continuously improving performance - one of the essential tenets of the OAA Amendments.

Required Questions

The survey uses a set of three required questions. The responses to these questions are then used to form a customer satisfaction "index." The questions are:

1. Using a scale of 1 to 10 where "1" means "Very Dissatisfied" and "10" means "Very Satisfied" what is your overall satisfaction with the services provided
2. Considering all of the expectations you may have had about the services, to what extent have the services met your expectations? "1" now means "Falls Short of Your Expectations" and "10" means "Exceeds Your Expectations"
3. Now think of the ideal program for people in your circumstances. How well do you think the services you received compare with the ideal set of services? "1": now means "Not Very Close to the Ideal" and "10" means "Very Close to the Ideal."

The ACSI score is obtained by combining scores from these three specific questions that address different dimensions of customers' experiences. In order for the ACSI survey to yield meaningful results under the prescribed methodology, the survey questions cannot be modified in any significant way. Only the ACSI score will be used to determine a grantee's performance on this measure. However, the Department will be adding additional questions, beyond those required for the ACSI, to inform grantees and the national office of customers' evaluations of the services they have received. Our research indicated that adding more questions will not decrease the number of responses.

Tennessee is expected to have a combined score for all three surveys. within 10 percentage points of the National Average of all SCSEP Grantee scores.

Earnings Increase

The Department has elected to add Earnings increase to the measures mandated by OAA legislation. Earnings increase is one of the Common Measures that were

developed in a Government-wide initiative and adopted by the Department for all DOL-funded employment and job training programs. The purpose of the common measures initiative is to compare the performance of a variety of Federal programs that have similar goals and operations. The Job Training Common Performance Measures apply to over thirty separate programs administered by the Departments of Labor, Education, Veterans Affairs, Health and Human Services, Interior, and Housing and Urban Development. For job training programs that serve adults, there are four Common Measures:

1. Entered Employment Rate
2. Retention in Employment
3. Earnings Increase (as a result of program participation)
4. Program Efficiency (cost per participant)

Although only Earnings Increase is being adopted as a sanctionable SCSEP measure, the Department will collect data on the other common measures listed above. (The last measure, program efficiency, applies to the aggregate results of the entire program and not to individual grantees.) However, OMB will evaluate the overall effectiveness of SCSEP based on these measures and will require that data be collected to support these additional measures. It should be noted that the Retention, Earnings Increase, and Program Efficiency measures are new to SCSEP; and the Entered Employment Rate is calculated by a different methodology from the one that SCSEP grantees use "placement into unsubsidized public or private employment" - the SCSEP Placement Rate.

The Department of Labor has used its discretionary authority, specified in OAA Amendments, section 513(b)(5), to select measure #3 (Earnings Increase) as a required performance indicator for SCSEP in 2004. Earnings Increase has two separate components:

- a. Earnings Increase 1 ("pre-post") is defined as follows: "Of those who are employed in the 1st quarter after program exit, earnings in the first quarter after exit minus earnings in the quarter prior to registration divided by earnings in the quarter prior to registration."
- b. Earnings Increase 2 ("post-post") is defined as follows: "Of those who are employed in the 1st quarter after program exit, earnings in the third quarter after exit minus earnings in the first quarter after exit divided by earnings in the first quarter after exit."

*The standard for Tennessee shall be; earnings increase 1 shall be 25% higher than the pre-program earnings and earnings increase 2 shall be 1% higher than earnings increase 1. This is **not sanctionable** for Program Year 2004.*

SETTING PERFORMANCE LEVELS AND MAKING ADJUSTMENTS.

Performance levels (or standards) for the first six performance measures will be set on July 1, 2005, for every State grantee and national grantee organization. Our plan is to base the performance levels for each of these indicators on data to be collected by the SCSEP system in PY 2004. Baseline data on the earnings increase measure will be collected during PY 2004 and PY 2005, and the performance levels for this measure will be effective on July 1, 2006.

Although the proposed Program Year 2004 Tennessee Performance rates may be considered practice, it is important that the experience prove worth while and provide Tennessee with the capacity to meet the formal performance standards when they are established.

PLAN-RELATED TERMINATIONS

614.580 If, at any time, the grantee or a sub-grantee determines that a participant was incorrectly declared eligible as a direct result of false information given by that individual, the individual will be given a written notice explaining the reason or reasons for the determination and will be terminated immediately.

Each grantee or sub-grantee will recertify the income of each participant under its grant or sub-grant, respectively, once each project year. Participants found to be ineligible for continued enrollment because of income will be given, by the grantee or sub-grantee, a written notice of termination and be terminated 30 days after the notice.

If, at any time, the grantee or sub-grantee determines that a participant was incorrectly declared eligible through no fault of the participant, the grantee or sub-grantee will give the participant immediate written notice explaining the reason or reasons for termination, and the participant will be terminated 30 days after the notice.

When a grantee or sub-grantee terminates a participant for cause, it will inform the participant in writing, of the reason(s) for termination and discuss the proposed reasons for such termination in the grant application and must discuss reasons with participants and provide each participant a written copy of the policies for terminating a participant for cause or otherwise at time of enrollment.

Grantees or sub-grantees may terminate a participant if the participant refuses to accept a reasonable number of referrals or job offers to unsubsidized employment consistent with his or her IEP and there are no extenuating circumstances that would hinder the participant from moving to unsubsidized employment.

When a grantee or sub-grantee makes an unfavorable determination of enrollment eligibility under paragraphs (a),(b), and (c) of this section, it must give the individual a reason for termination and when feasible should refer the individual to other potential sources of assistance such as the one stop system.

Any termination as described in (A) through (F) must be consistent with administrative guidelines issued by the Department and terminations must be subject to applicable grievance procedures 641.910.

Participants may not be terminated from the program solely on their age. Grantees and sub-grantees may not impose an upper age limit for SCSEP participation.

1. Has such termination occurred? Yes ____ No ____
2. Was it documented according to guidelines? Yes ____ No ____
3. Was appeal rights and procedures used? Yes ____ No ____

STATUS OF PARTICIPANTS

Reg. 641-585 – 641-590

641.585 Participants who are employed in any project funded under the OAA are not Federal employees as a result of such employment. [Section 504(a) of the OAA.]

If a Federal agency is a grantee or host agency 641.590 applies.

641.590 Grantees must determine if a participant is an employee of the grantee, local projects or host agency as definition of an “employee” varies depending on the law defining an employer/employee relationship.

1. During orientation and throughout participation, are participants informed and reminded of the non-employment status of community service activities?
Yes ____ No ____
2. Is it documented? Yes ____ No ____

OVER-ENROLLMENT

Use Old Reg. 641-318

(Until further notice from USDOL)

Should attrition or funding adjustments prevent a portion of project funds from being fully utilized, the grantee may use those funds during the period of the agreement to over-enroll additional eligible individuals. The number over-enrolled may not exceed 20 percent of the total number of authorized positions established under the grant agreement without the written approval of the Department. Payments to or on behalf of participants in such positions shall not exceed the amount of the unused funds available. Each individual enrolled in such a position shall be informed in writing that the assignment is temporary in nature and may be terminated. The grantee shall first seek to maintain full enrollment in authorized positions and shall seek to schedule all enrollments and terminations to avoid excessive terminations at the end of the grant period.

1. Is the project over-enrolled? Yes ____ No ____
2. Is the project over or under-spent? Yes ____ No ____
3. How does the project monitor spending levels during the grant year?
Yes ____ No ____

POLITICAL PATRONAGE AND POLITICAL ACTIVITIES
Reg. 641.833 – 641.836

A recipient or sub-recipient must not select, reject, promote or terminate an individual based on political services provided by the individual or on the individual's political affiliations or beliefs.

No project under Title V of OAA may involve political activities.

No participant or staff persons may be permitted to engage in partisan or nonpartisan political activities during hours for which the participant is paid with SCSEP funds.

No participant or staff person at any time may be permitted to engage in partisan political activities in which such participant represents himself or herself as a spokesperson of the SCSEP project.

No participant may be employed or out stationed in the office of a member of Congress or a State or local legislator or on any staff of a legislative committee.

No participant may be employed or out stationed in the immediate office of any elected chief executive officer (or officers, in the office of chief executive is shared by more than one person) of a State or unit of general government, except that:

- a. Units of local government may serve as host agencies for participant provided that, such assignments are nonpolitical.
- b. While assignments are technically in such offices, such assignments are program activities and not in any way involved in political functions,
- c. Participants are assigned to perform political activities in the office of other elected officials. Placement of participants in such nonpolitical assignments is permissible, however, provided that project sponsors develop safeguards to ensure that participants placed in these assignments are not involved in political activities. These safeguards shall be described in the grant agreement and will be subject to review and monitoring by SCSEP recipient and by the Department.

State and local employees governed by 5 U.S.C. Chapter 15 shall comply with the Hatch Act provisions.

Each project subject to 5 U.S.C. Chapter 15 shall display a notice and shall make available to each person associated with such project a written explanation, clarifying the law with respect to allowable and unallowable political activities under 5 U.S.C. chapter 15 which are applicable to the project and each category of individuals associated with such project. This notice, which shall have the approval of the Department, shall contain the telephone number and address of the DOL Inspector General. [Section 502(b)(1)(P) of the OAA.] Enforcement of the Hatch Act shall be as provided at 5 U.S.C. 1502.

Is there a procedure in place that governs implementation of the provision against activities utilizing SCSEP funds? Yes _____ No _____

1. How are project staff members advised of these requirements?

2. How are SCSEP staff and participants informed that they are prohibited from participating in political activities while on the job?

UNIONIZATION
Reg. 641.839

No funds provided under the Act may be used in any way to assist, promote, or deter union organizing.

1. Are project funds used in any way to support union activity? (Verify).
Yes _____ No _____
2. Are any participants paying union dues? Yes _____ No _____

NEPOTISM

674.841 No grantee or sub-grantee may hire, and no host agency may be a work site for a person who works in an administrative capacity, staff position, or community service position funded under Title V or this part if a member of that person's immediate family is engaged in a decision-making capacity (whether compensated or not) for that project, subproject, grantee, sub-grantee or host agency. This provision may be waived by the Department at work sites on Native American reservations and rural areas provided that adequate justification can be documented, such as that no other persons are eligible for participation.

To the extent that an applicable State or local legal requirement regarding nepotism is more restrictive than this provision, that requirement shall be followed.

For purposes of this section:

- a. The term "immediate family" means wife, husband, son, daughter, mother, father, brother, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, stepparent and stepchild, grandparent, and grandchild.
 - b. The term "engaged in an administrative capacity" included those persons who in the administration of project, subprojects, or host agencies have responsibility for or authority over those with responsibility for the selection of participants from among eligible applicants.
1. How does the project ensure for itself and host agencies conformance to nepotism requirements? (Verify) Yes _____ No _____

GRIEVANCE PROCEDURES for APPLICANTS, PARTICIPANTS AND EMPLOYEES

641.910 Each grant must establish, and describe and describe in the grant agreement grievance procedures for resolving complaints, other than those described in paragraph (d) arising between the grantee, employees of the grantee, sub-grantee and employees of the sub-grantee and applicants or participants.

USDOL will not review final determinations made under paragraph (a) of this section, except to determine whether the grantee's grievance procedures were followed according to paragraph (c) of this section

Allegations of violations of federal law, other than those described in paragraph (d) of this Section, which cannot be resolved within 60 days under the grantee's procedures, may be filed with the Chief, Division of Older Worker Programs, Employment and Training Administration, U.S. Department of Labor, 200 Constitution Avenue, N.W., Washington, D.C. 20210.

Questions about or complaints alleging a violation of the nondiscrimination requirement of Title VI of the Civil Rights Act 1964, Section 504 of the Rehabilitation Act of 1973, Section 188 of the WIA of 1998 or their implementing regulations may be directed to the Director, Civil Rights, USDOL RM N-4123, 200 Constitution Avenue, N.W., Washington, D.C. 20210. Complaints alleging violations of WIA section 188 may be filed initially at the grantee level. See 29 CFR 37.71 , 37.76. In such cases, the grantee must use complaint processing procedures meeting the requirements of 29 CFR 37.70 to resolve the complaint.

1. Does the project have written personnel policies and procedures? Yes ____ No ____
2. If yes, does it include: grievance procedures? Yes ____ No ____
3. Are grievance procedures followed? Yes ____ No ____
4. Have any complaints been filed this grant year? Yes ____ No ____
5. Are these documented in files? Yes ____ No ____
6. When a project decides to take adverse action against a participant, does the Project Director notify the state coordinator prior to taking any action? Yes ____ No ____
7. Was adverse action initiated against any participants during the previous program year? Yes ____ No ____

(Explain.)

8. How does the project assure that no person is excluded from participation on the grounds of race, creed, color, handicap, national origin, sex, political affiliation or beliefs?

9. Have there been any reports or accusations of suspected discrimination brought to the attention of project staff? Yes _____ No _____

a. How have they been handled? (Explain)

10. What has the project done to ensure compliance and train the staff with ADA?

11. Does the project ensure that nondiscrimination assurances are included in all contractual agreements? Yes _____ No _____

MAINTENANCE OF EFFORT

641.844 Employment of a participant funded under Title V of the Older American Act is permissible only in addition to employment that would otherwise be funded by the recipient, sub-recipient and host agency without assistance under OAA sec. 502(b)(1)(F)

Each project funded under Title Act V:

- a. must result in an increase in employment opportunities in addition to those which would otherwise be available;
- b. Must not result in the displacement of currently employed workers, including partial displacement such as a reduction in hours of non-overtime work, wages, or employment benefits;

- c. Must not impair existing contracts for service or result in the substitution of connection with work that would otherwise be performed;
- d. Must not substitute SCSEP funded positions for existing Federally-assisted jobs; and,
- e. Must not employ any participant to perform work which is the same or substantially the same as that performed by any other person who is on layoff section 502(b)(1)(G).

1. How are host agencies made aware of the Maintenance of Effort (MOE) requirements? (Explain)

2. Are participants' work assignments a substitute for non-Title V work that should be performed by the regular employees of the host agency?

Yes _____ No _____

3. Are there any MOE violations? If so, explain.

Yes _____ No _____

Section II:

FINANCIAL ADMINISTRATIVE MANAGEMENT & REPORTING

Title V Regulations Specific

Uniform Administrative Requirement SCSEP Funds

641.800 SCSEP sub-recipients must follow uniform administrative and allowable cost requirements that apply to their type of organization.

Program Income

641.806 Income earned must be added the funds to SCSEP and use it for the program. Funds must used in the PY it was received. Recipients that do not continue receiving SCSEP grant from USDOL must return program income earned to USDOL.

Non-Federal Share (Matching) Requirements

641.809 USDOL pays no more than 90% for activities carried out under SCSEP grant. SCSEP recipients must provide or ensure at least 10% (non-Federal share of costs). It may be provided in cash, or in-kind, or a combination of the two. A recipient may not require a grantees or host agencies to provide it as a condition of entering into a sub-recipient or host relationship.

Funds Availability Period

641.812 Recipients must expend SCSEP funds during the program year for which they are awarded.

SCSEP Audit Requirements

641.821 Recipients and sub-recipients receiving SCSEP funds must follow audit requirements that apply to their organization. (see 641.821 (b) and (c) and OAA sec503(f)(2).

SCSEP Uniform Allowable Costs

641.847 Unless specified otherwise in the regulations or the grant agreement, recipients and sub-recipients must follow the uniform allowable cost requirements that apply to their type of organization. (see 641.847(a) and (b))

Other Specific Allowable and Unallowable Costs

641. 850 Claims against the government are unallowable and lobbying costs are unallowable. Allowable are One-Stop Costs, minor building repair related costs, accessibility and reasonable accommodation costs, and participant fringe benefit costs. (see 641.850for detailed explanation)

Cost Classification

641.853 All costs must be classified as administrative costs or program costs.... participant's wages and fringe benefit costs and other participant participant costs and other costs such as supportive services are in the program cost category. Costs normally associated with administration costs that are host agency/participant related services are charged to program costs.

EXAMPLE:

1. Program Costs
 - a. Participant Wages and Fringe Benefits (EWF)
 - b. Other Participant Costs (OEC)
2. Administration (see 641.853 for details)

Administration Costs Activities

641.856 The cost of administration are those that are not related to programmatic services. (see specified at 641.856 (a) through (c))

Other Special Rules Administration Costs and Program Costs

641.859 Recipients and sub-recipients must comply with the special rules for classifying cost s as administrative costs or program costs as set forth in 641.859 (a) through (c).

Program Cost Activities

641.864 Program cost activities include:

- Participant Wages and Fringe Benefits for hours of community services
- Outreach, recruitment and selection and preparation of and updating IEPs
- Participant training provided on the job, in a classroom setting, or utilizing other appropriate arrangements as reasonable costs of instructors' salaries classroom space, training supplies, materials, equipment and tuition;

Subject to restrictions in 641.535, job placement assistance including job development and job search, job fairs, job clubs, and job referrals and; Participant support services as described in 641.545.(OAA sec. 502©(6)(A)).

Limitations on SCSEP Administration Costs

641.867 SCSEP sub-recipients must follow the grant instruction as to the percentage of SCSEP funds to be used as administrative costs.

Participant Wages and Fringe Benefits Minimum

641.873 No less than 75% of the SCSEP funds provided under a grant from USDOL must be used to pay for wages and fringe benefits of participants in such projects including 502(e) of the OAA.

Determination of Cost Limitations and Minimum Expenditures

641.876 TDLWD will determine compliance by examining expenditures of SCSEP funds. The cost limitations and minimum expenditure level requirements must be met at the time all such funds have been expended or the period of availability of such funds has expired, whichever comes first.

Fiscal and Performance Reporting Requirements

641.879 In accordance with 29 CFR 97.40 or 29 CFR 95.51 as appropriate each SCSEP recipient must submit an SCSEP Quarterly Progress Report (QPR) to TDLWD in electronic format via the internet within 30 days after the end of each quarter of the Program Year....

In accordance with 29 CFR 97.41 or 29 CFR 95.52 as appropriate each SCSEP recipient must submit an SCSEP Quarterly Financial Status Report (FSR) to TDLWD in electronic format via the internet within 30 days after the end of each quarter of the Program Year....

(see 641.879 (a), (b), (c), (d), (e), (f), (g), (h), (I) for detail explanation)

Grant Closeout Procedures

641.884 SCSEP recipients must follow the grant closeout procedures at 29 CFR 97.50 or 29 CFR 95.71 as appropriate. The TDLWD will issue closeout instructions to projects as necessary.

FISCAL MANAGEMENT

1. Are the expenditures charged to Title V reasonable (based on allocation formula)? Yes ____ No ____
2. Does the accounting system have cost codes to separate Title V from other programs? Yes ____ No ____
3. Does the project have a system for allocating cost to the appropriate cost category? Yes ____ No ____
4. Does the project have a system for monitoring planned vs. actual cost and for taking corrective action? Yes ____ No ____

If yes, please describe below:

5. Has the project earned any program income? Yes ____ No ____

If yes, explain how this income was used)

6. Does the Project Office accounting system provide adequate cost data to Project Director? Yes ____ No ____

7. Did the project comply with all closeout procedures required by the Legal Agreement? Yes ____ No ____

FINANCIAL REPORTS

8. Has the project submitted accurate monthly and quarterly financial reports on a timely basis? Yes ____ No ____
9. Do all financial reports include accruals? Yes ____ No ____

INDIRECT COST

10. Does the sub-sponsor charge indirect cost to the grant? Yes ____ No ____
11. Does the sub-sponsor use an approved indirect cost rate for charging indirect cost to the grant? Yes ____ No ____
12. Does the rate agreement cover the period of performance for the current grant? Yes ____ No ____
13. What is the rate? Rate: _____

SUBSPONSOR SHARE (NON-FEDERAL CONTRIBUTION) OF PROJECT COST

14. How is the sponsor tracking and calculating the 10 percent share? Describe.

15. Is documentation available? Yes ____ No ____
16. Is it calculated and reported monthly? Yes ____ No ____

AUDIT REQUIREMENTS

17. What is the period covered by the most recent audit?

18. Were there any administrative findings in the last audit report?
Yes _____ No _____
19. Has the project taken corrective action to resolve findings?
Yes _____ No _____
20. Has a final Findings & Determination (F&D) been made?
Yes _____ No _____
21. Were any costs disallowed? Yes _____ No _____
 - a. If so, how much? \$ _____

Section III:

GRANT REQUIREMENT ADMINISTRATIVE REVIEW

I. ADMINISTRATION AND STAFFING

1. Is staffing in accordance with approved Contract Agreement and Budget?
Yes _____ No _____
2. Are job descriptions available? Yes _____ No _____
3. Do the job descriptions reflect accurately the time split between Program Costs and ADMIN? Yes _____ No _____
4. Does the project maintain, on-site, the following records:
 - a. Organizational Charts Yes _____ No _____
 - b. Position Descriptions Yes _____ No _____
 - c. Time Sheets Yes _____ No _____
5. Are there posting of appropriate posters (political activity limitation, EEO, etc.) in the project office? Yes _____ No _____

STAFF TRAINING

1. Has the project staff received orientation and ongoing training from the State?
Yes _____ No _____
2. Has the project provided orientation
and training to host agencies? Yes _____ No _____

PLAN OF ACTION AS DESCRIBED IN THE GRANT

1. Is the project following plan of action as outlined in the Grant Narrative?
Yes _____ No _____
2. Has staff implemented recommendations for any corrective action?
Yes _____ No _____
3. Are all members of the staff familiar and knowledgeable of the Grant's plan of action?
Yes _____ No. _____

PROGRAM REPORTING

1. Are Monthly and Quarterly, Financial and Programmatic, Reports submitted to the TDLWD accurately and in a timely manner? Yes _____ No _____

PARTICIPANT PAYROLL SYSTEM (PPS)

1. If there participant payroll files, are the following forms contained there?
 - a. Consecutive time sheets properly signed for each preceding pay period?
Yes _____ No _____
 - b. Evidence that wage is at least the same as current Federal or State minimum wage, whichever is higher? Yes _____ No _____
2. How does the PPS operate?
 - a. Are hours worked tracked cumulative? Yes _____ No _____
 - b. If applicable, are annual and/or sick leave time accrued accurately and are records kept? Yes _____ No _____
 - c. Are there two valid signatures (Participant and Supervisor) on each time sheet? Yes _____ No _____

d. Describe how the checks are disbursed?

PARTICIPANT FILE VERIFICATION

1. Do the files contain the following required current documentations?
 - a. Applicant/Participant Form jointly signed by the applicant/ participant & interviewer Yes ____ No ____
 - b. Community Service Form Yes ____ No ____
 - c. Confidential Income Statement jointly signed by the applicant/ participant & interviewer Yes ____ No ____
 - d. Recertification Yes ____ No ____
 - e. Applicant's Confidential Statement at Recertification Yes ____ No ____
 - f. Initial Assessment Form Yes ____ No ____
 - g. Annual Assessment Yes ____ No ____
 - h. Individual Employment Plan Yes ____ No ____
 - i. (Goals, Support Services, Training) Yes ____ No ____
 - j. 1.a. IEP Follow up/Review Yes ____ No ____
 - k. Initial physical, reexamination, and/or waiver? (Those enrolled after July 26, 1992 kept separately for ADA requirements) Yes ____ No ____
 - l. Exit Form Present? Yes ____ No ____
 - m. Termination for cause (including proper documentation) Yes ____ No ____

- n. Unsubsidized Placement Follow-up Yes ____ No ____
2. Was there a Participant Training Description at Host Agency?
Yes ____ No ____
3. Do you have the following Orientation Documentation?
- a. Participant Yes ____ No ____
- b. Host Agency Yes ____ No ____
- c. Grievance Procedure Yes ____ No ____
4. Are there records of Supportive Services including Quarterly participant meetings, job seeking skills training, etc.
Yes ____ No ____
5. Do you have the Participant Performance Evaluations
Yes ____ No ____
6. Are the Host Agency and Participant documents present?
Yes ____ No ____
7. Was there a Monitoring Form?
Yes ____ No ____
8. Are Host Agency File Verifications included? Yes ____ No ____
9. Host agency Agreement w/ FEIN Yes ____ No ____
10. 501^{(c)(3)} Verification Yes ____ No ____
11. Do the files contain required copies of source documentation to prove
- Age Yes ____ No ____
- Income Sources Yes ____ No ____
- Family Size Yes ____ No ____
12. Copy of income tax forms should applicant/participant be claimed as a dependent of a family member w/ whom they reside? Yes ____ No ____

501^{(c)(3)} Verification

Yes ____ No ____

INSURANCE AND BONDING REQUIREMENTS

1. Does the project have adequate public liability and other appropriate forms of insurance as stated in the Grant Agreement? Yes ____ No ____
 - a. Workers' Compensation Insurance? Yes ____ No ____
 - b. Occupational Diseases Insurance? Yes ____ No ____

- c. Employer Liability Insurance? Yes ____ No ____
- d. General Liability Insurance? Yes ____ No ____
- e. Automobile Liability Insurance? Yes ____ No ____

TRAVEL PROCEDURES

Are there written travel procedures? Yes ____ No ____

Do the travel expenses charged to the sub-grant meet the requirements of the Grant? Yes ____ No ____

EQUITABLE DISTRIBUTION

1. Does the project have a copy of the latest Equitable Distribution Plan?
YES ____ No ____

STATE SENIOR EMPLOYMENT SERVICES COORDINATION PLAN

1. Does the project have a copy of the latest State Plan?
Yes ____ No ____

Section IV:

PARTICIPANT TRAINING SITE VISIT

Since a Senior Community Service Employment Program is made up of people, it is important that the participants be interviewed to obtain their perspective and to analyze the program from the impact it has on their lives. Moreover, it is a good way to see if those program rules relating to participants are being followed.

The following list of questions may be used in each interview or in a few interviews. Each question may not be appropriate in each interview. Taken collectively, they represent an effort to get at an overall perception of the project. However, the interviewer must also be aware of individual violations of the regulations. For instance an individual violation of the nepotism rule should be noted so that corrective action can be taken.

The monitor should adapt his/her own particular style of interviewing and need not ask the questions in any predetermined order. The approach is a flexible one but at the conclusion of the interviews the monitor should be able to characterize the project's

treatment of the s. Since the s represent 75% plus of the project expenditures, most compliance issues can be examined during the course of the interviews.

INTERVIEW GUIDE

1. How did you find out about SCSEP?

2. What is your training assignment? What do you do?

3. What were you doing prior to SCSEP?

4. When you made application:

a. Were you informed of working conditions, wages, fringe benefits, and supportive services? Yes _____ No _____

b. Were you given a copy of your training assignment? Yes _____ No _____

c. Were you told you could not perform any political activity during working hours or other hours for which you are receiving pay under this program? Yes _____ No _____

d. Were you informed about the role of the Tennessee Department of Labor and Workforce Development as the funding source for this program? Yes _____ No _____

e. Did you receive materials to assist you in your training assignment?
Yes _____ No _____

f. Did you receive any training before being placed at the training site?
Yes _____ No _____

1. If yes, how many weeks? _____

g. Have you received any training since you have been on the program?
Yes _____ No _____

h. Describe your training.

5. Were you given a copy of the Title V grievance procedures?
Yes _____ No _____

6. Were you given any training on how to find an unsubsidized job?
Yes _____ No _____

7. What are you currently doing to find unsubsidized employment?

8. Time and Attendance

a. How do you account for your time? Yes _____ No _____

b. How often are you paid? _____

c. How many hours do you work per week? _____

d. Do you receive annual and/or sick leave? Yes _____ No _____

- e. Do you ever work without pay or compensatory time? (Volunteer)
Yes _____ No _____
- f. Are you paid on time? Yes _____ No _____
9. Did you receive counseling as an ongoing process to further your training?
Yes _____ No _____
a. Group Yes _____ No _____
b. Individual Yes _____ No _____
10. Are sessions on a regular basis? Yes _____ No _____
a. If yes, how often? _____
11. When was the last time someone from the program visited your training site?

12. Are you receiving or have you received any supportive services?
Yes _____ No _____
a. If so, what type?

13. Were you offered a physical exam before you entered the SCSEP program?
Yes _____ No _____
14. Was it before you began your training? Yes _____ No _____
15. Did you pay for your own physical examination? Yes _____ No _____

OBSERVATIONS ABOUT SUPERVISION AND HOST AGENCIES

1. Were the participants being supervised? Yes ____ No ____
2. Were the participants working under safe and healthy working conditions?
Yes ____ No ____
3. Did the host agency appear to be one that could provide appropriate training to the and serve as a future unsubsidized placement site?
Yes ____ No ____

4. How are host agencies encouraged to take s on to their regular staff?

5. Name the host agencies visited.

ADDITIONAL COMMENTS BY S OR THEIR SUPERVISORS:

EXTRA COMMENTS:

Subrecipient: _____

Grant\Contract No: _____

Funding/Service: **TDOLWD**

Monitor: _____

Date of Visit _____

OFFICE OF PROGRAM ACCOUNTABILITY REVIEW

TDOLWD TITLE V (SCSEP) Case Record Review

X – Yes or Compliant, O – No or Not Compliant, N/A – Not applicable

CASE NAME AND SOCIAL SECURITY NUMBER	Date of Birth	Is the participant at least 55 years of age?	Age & SS Verification	Date of initial SCSEP application-Is application signed by participant & interviewer	Eligibility – verify income eligibility (income sources, family size, etc)	Has participant been recertified at least once every 12 months?	Confidential Income Statement	If participant is no longer eligible , was the part. Given written notice w/in 30 days?	Community Service Form	I-9 Employment Eligibility Verification Form	Initial Assessment Form	Annual Assessment	IEP (Individual Employment Plan) developed ----- Does IEP include Goals, Support Service, Training?	Physical exam or Waiver Form every 12 months	Exit Form	Termination for cause (Is there proper documentation)	Unsubsidized Placement Followup	Participant Training Description at Host Agency (Job Description)	Did Orientation include – Participant, Host & Grievance	Does participant get any Supportive Services? (Quarterly Part. Meetings, Job Seeking Skills Training, etc)	Participant Performance Evaluation	Host Agency & Participant Documentation	Monitoring Form	Host Agency File Verification	Host Agency agreement w/FEIN	Host Agency 501©(3) verification	Comments

Subrecipient: _____
Grant\Contract No: _____ Funding/Service: **TDOLWD**

Monitor: _____
Date of Visit _____

CASE NAME AND SOCIAL SECURITY NUMBER	Date of Birth	Is the participant at least 55 years of age?	Age & SS Verification	Date of initial SCSEP application-Is application signed by participant & interviewer	Eligibility – verify income eligibility (income sources, family size, etc)	Has participant been recertified at least once every 12 months?	Confidential Income Statement	If participant is no longer eligible , was the part. Given written notice w/in 30 days?	Community Service Form	I-9 Employment Eligibility Verification Form	Initial Assessment Form	Annual Assessment	IEP (Individual Employment Plan) developed ----- Does IEP include Goals, Support Service, Training?	Physical exam or Waiver Form every 12 months	Exit Form	Termination for cause (Is there proper documentation)	Unsubsidized Placement Followup	Participant Training Description at Host Agency (Job Description)	Did Orientation include – Participant, Host & Grievance	Does participant get any Supportive Services? (Quarterly Part. Meetings, Job Seeking Skills Training, etc)	Participant Performance Evaluation	Host Agency & Participant Documentation	Monitoring Form	Host Agency File Verification	Host Agency agreement w/FEIN	Host Agency 501©(3) verification	Comments